

# **Exhibit 19**



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# Transcript of Jason Svonavec

**Date:** November 5, 2024

**Case:** Heritage Holding Co. -v- KTRV, LLC / Banshee Industries -v- Heritage Coal

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Michigan #8598 | Nevada #089F | New Mexico #566

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

- - - - - x  
HERITAGE HOLDING CO., :  
LLC, a Pennsylvania :  
limited liability :  
company, :  
Plaintiff, : Civil Action No.  
v. : 2:24-cv-1448  
KTRV, LLC, :  
Defendant. :  
----- :  
BANSHEE INDUSTRIES, :  
LLC, a Pennsylvania :  
limited liability :  
company, :  
Plaintiff, : Civil Action No.  
v. : 3:24-cv-233  
HERITAGE COAL & :  
NATURAL RESOURCES, :  
LLC, :  
Defendant. :  
- - - - - x

Deposition of JASON SVONAVEC

Somerset, Pennsylvania

Tuesday, November 5, 2024

9:56 a.m.

Job No.: 559369

Pages: 1 - 61

Reported By: Maria M. Siatkowski, RDR, CRR, CRC

Transcript of Jason Svonavec  
Conducted on November 5, 2024

2

1 Deposition of JASON SVONAVEC, held at the  
2 offices of:

3  
4  
5 Law Office of Matthew R. Zatko  
6 202 East Union Street  
7 Somerset, PA 15501  
8 814-443-1631  
9  
10  
11  
12

13 Pursuant to notice, before Maria M. Siatkowski,  
14 Registered Diplomate Reporter, Certified Realtime  
15 Reporter, Certified Realtime Captioner, and Notary  
16 Public in and for the Commonwealth of  
17 Pennsylvania.  
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Transcript of Jason Svonavec  
Conducted on November 5, 2024

3

A P P E A R A N C E S

ON BEHALF OF THE PLAINTIFFS, HERITAGE HOLDING  
CO., LLC AND BANSHEE INDUSTRIES:

DEAN R. PHILLIPS, ESQUIRE

MORELLA & ASSOCIATES

706 Rochester Road

Pittsburgh, PA 15237

412-369-9696

ON BEHALF OF THE PLAINTIFFS, HERITAGE HOLDING  
CO., LLC AND BANSHEE INDUSTRIES:

MATTHEW R. ZATKO, ESQUIRE

LAW OFFICE OF MATTHEW R. ZATKO

202 East Union Street

Somerset, PA 15501

814-443-1631

ON BEHALF OF DEFENDANTS KTRV, LLC AND HERITAGE  
COAL:

T. NATHAN TOWNSEND, ESQUIRE

K&L GATES, LLP

K&L Gates Center

210 Sixth Avenue

Pittsburgh, PA 15222-2613

412-355-6500

Transcript of Jason Svonavec  
Conducted on November 5, 2024

4

1 ALSO PRESENT:

2 Dylan Kiesler, Videographer  
3  
4  
5  
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Transcript of Jason Svonavec  
Conducted on November 5, 2024

5

## C O N T E N T S

EXAMINATION OF JASON SVONAVEC	PAGE
BY MR. TOWNSEND	7
BY MR. PHILLIPS	59

## EXHIBITS

(Attached to transcript)

EXHIBIT NO.		PAGE
EXHIBIT 1	Signature	8
EXHIBIT 2	Request for Bureau of Prisons location	16
EXHIBIT 3	Membership Interest Assignment Agreement	23
EXHIBIT 4	Operating Agreement of Jason's Interest, LLC	25
EXHIBIT 5	Dropbox Sign document	29
EXHIBIT 6	Membership Interest Assignment Agreement	38
EXHIBIT 7	2022 tax return	43
EXHIBIT 8	2019 tax return	46
EXHIBIT 9	2019 Loan Interest Statement	49

Transcript of Jason Svonavec  
Conducted on November 5, 2024

6

## P R O C E E D I N G S

THE VIDEOGRAPHER: Here begins Media No. 1  
in the videotaped deposition of Jason Svonavec in  
the matter of Heritage Holding Co., LLC v. KTRV,  
LLC and Banshee Industries, LLC v. Heritage Coal &  
Natural Resources, LLC, in the United States  
District Court for the Western District of  
Pennsylvania, Case Numbers 2:24-cv-1448 and  
3:24-cv-233.

09:55:34  
09:55:36  
09:55:43  
09:55:48  
09:55:53  
09:55:56  
09:56:00  
09:56:08

Today's date is November 5, 2024, and the  
time on the video monitor is 9:56 a.m. Eastern  
Standard Time. The videographer today is Dylan  
Keisler, representing Planet Depos, and the video  
deposition is taking place at 202 East Union  
Street, Somerset, PA, 15501.

09:56:11  
09:56:17  
09:56:21  
09:56:24  
09:56:30  
09:56:33

Would counsel please voice identify  
themselves and state whom they represent.

09:56:37  
09:56:39

MR. TOWNSEND: Nathan Townsend of K&L  
Gates representing both Defendants.

09:56:41  
09:56:44

MR. PHILLIPS: Dean Phillips of Morella &  
Associates, representing both Plaintiffs.

09:56:47  
09:56:50

MR. ZATKO: Matt Zatko of Zatko Law,  
representing both Plaintiffs.

09:56:52  
09:56:55

THE VIDEOGRAPHER: The court reporter  
today is Maria Siatkowski, representing Planet

09:56:57  
09:56:58



Transcript of Jason Svonavec  
Conducted on November 5, 2024

7

1	Depos, and the witness will now be sworn.	09:57:00
2	Thereupon--	
3	JASON SVONAVEC	
4	was called as a witness by the Defendants and,	
5	having been first duly sworn, testified as	
6	follows:	
7	EXAMINATION	09:57:14
8	BY MR. TOWNSEND:	09:57:15
9	Q Good morning, Mr. Svonavec. My name is	09:57:15
10	Nathan Townsend. I have a few questions to ask	09:57:17
11	you today here in this deposition.	09:57:19
12	Do you understand that the oath you just	09:57:20
13	gave means that you need to answer every question	09:57:21
14	I have of you truthfully?	09:57:25
15	A Yes.	09:57:26
16	Q Is there any reason that you would not be	09:57:26
17	able to answer questions truthfully today?	09:57:28
18	A No.	09:57:30
19	Q Thank you.	09:57:31
20	Mr. Svonavec, I'd like you to take this	09:57:32
21	piece of paper and if you can sign and produce	09:57:35
22	your signature on it, please.	09:57:40
23	Thank you, Mr. Svonavec. This will be	09:57:45
24	marked as Exhibit 1.	09:57:47
25	(Exhibit 1 was marked for identification	09:57:51

Transcript of Jason Svonavec  
Conducted on November 5, 2024

8

1	and is attached to the transcript.)	09:57:59
2	Q We'll leave that there.	09:57:59
3	How long have you been married to Angela	09:58:06
4	Svonavec?	09:58:10
5	A 22 years.	09:58:11
6	Q Do you remember the year you were married?	09:58:13
7	A Yeah. '02.	09:58:15
8	Q Have you had any children with Angela	09:58:19
9	Svonavec?	09:58:23
10	A Yes.	09:58:24
11	Q How many?	09:58:24
12	A One.	09:58:26
13	Q What's his name?	09:58:26
14	A Spencer.	09:58:27
15	Q Last name?	09:58:28
16	A Svonavec.	09:58:30
17	Q Do you have any stepchildren?	09:58:30
18	A Yes.	09:58:34
19	Q How many?	09:58:34
20	A One.	09:58:35
21	Q What is this person's name?	09:58:36
22	A Sydney Beam.	09:58:38
23	Q When was Spencer born?	09:58:41
24	MR. PHILLIPS: Objection. Relevance.	09:58:44
25	Q You can answer, Mr. Svonavec.	09:58:47

Transcript of Jason Svonavec  
Conducted on November 5, 2024

9

1	A Well, he's 21, so I don't know the year.	09:58:50
2	Q That was my next question. So he's 21?	09:58:55
3	A Yep.	09:58:57
4	Q What does Spencer do for a living?	09:58:57
5	MR. PHILLIPS: Objection. Relevance.	09:59:00
6	Q You can answer.	09:59:05
7	A Mines coal.	09:59:06
8	Q Does he own a coal company?	09:59:09
9	A Yes.	09:59:12
10	MR. PHILLIPS: Objection. Relevance.	09:59:12
11	Q How did he learn how to mine coal?	09:59:16
12	MR. PHILLIPS: Objection. Relevance.	09:59:18
13	Nathan, where are we going with this?	09:59:20
14	MR. TOWNSEND: Dean, I appreciate the	09:59:22
15	objections and the questions. We'll be moving	09:59:27
16	quickly. You don't need to worry. We're just	09:59:29
17	moving through some preliminary things.	09:59:32
18	Q Mr. Svonavec, you can -- you can answer,	09:59:35
19	if you remember the question.	09:59:37
20	A What was the question?	09:59:38
21	Q The question was how did Spencer learn how	09:59:40
22	to mine coal?	09:59:42
23	A I guess he just picked it up.	09:59:43
24	Q Who did he pick it up from?	09:59:45
25	A Probably myself, my wife, my father.	09:59:46

Transcript of Jason Svonavec  
Conducted on November 5, 2024

10

1	Q Did he ever work for you?	09:59:50
2	MR. PHILLIPS: I'm going to object again	09:59:54
3	to this whole line of questioning, just so it's on	09:59:56
4	the record, as to relevance.	09:59:59
5	A A little bit out of high school.	10:00:01
6	Q Did he work for you in high school?	10:00:05
7	A Maybe on the farm.	10:00:07
8	Q What's the farm?	10:00:11
9	A Banshee Farms.	10:00:13
10	Q Where is that?	10:00:15
11	A Rockwood.	10:00:16
12	Q In Somerset County?	10:00:17
13	A Yes.	10:00:22
14	Q Did he ever do coal mining in high school?	10:00:22
15	A I don't know if he was out of high school	10:00:26
16	or not. I don't -- I don't remember if he was	10:00:31
17	still in high school.	10:00:33
18	Q Where did Spencer go to high school?	10:00:34
19	A He did cyber school online.	10:00:39
20	Q What was the name of the school?	10:00:44
21	A I don't know.	10:00:47
22	Q Did you ever attend any sort of	10:00:47
23	parent/teacher meetings for this school?	10:00:53
24	MR. PHILLIPS: Objection. Relevance.	10:00:55
25	A Not that I recall.	10:00:56

Transcript of Jason Svonavec  
Conducted on November 5, 2024

11

1	Q Did Angela?	10:00:57
2	A I don't know.	10:00:59
3	Q Did he graduate from this cyber school?	10:01:00
4	MR. PHILLIPS: Objection. Relevance.	10:01:06
5	A Yes.	10:01:08
6	Q Where did Spencer sit when he was	10:01:10
7	attending the cyber school?	10:01:17
8	MR. PHILLIPS: Object to the form of the	10:01:19
9	question. What do you mean by where did he sit?	10:01:23
10	Q So to clarify, did Spencer -- where did	10:01:28
11	Spencer log on from on the computer when he	10:01:30
12	attended this cyber school?	10:01:33
13	A Florida.	10:01:35
14	Q The entire time?	10:01:36
15	A As far as I know, yes.	10:01:39
16	Q Did he ever log on and attend the cyber	10:01:40
17	school in Pennsylvania?	10:01:45
18	A Not that I'm aware of, but I have no idea.	10:01:45
19	I wasn't involved in any schooling.	10:01:51
20	Q Did you ever see any report cards?	10:01:53
21	A No.	10:01:56
22	Q Where is Spencer a resident of now? What	10:01:57
23	state?	10:02:04
24	A He's a resident of Pennsylvania now.	10:02:04
25	Q Mr. Svonavec, when did you first purchase	10:02:14

Transcript of Jason Svonavec  
Conducted on November 5, 2024

12

1	real estate in Florida?	10:02:19
2	A I'm gonna say probably 12 to 15 years ago.	10:02:23
3	Q Can you give me a year?	10:02:28
4	A No. I said 12 to 15 years, so I -- I	10:02:30
5	don't know exactly when.	10:02:33
6	Q What was the name of the address of the	10:02:34
7	property?	10:02:36
8	A It was Portside Drive. I don't remember	10:02:37
9	the numbers, though.	10:02:39
10	Q And where is that located?	10:02:41
11	A Naples, Florida.	10:02:42
12	Q Do you own that property still?	10:02:44
13	A No.	10:02:49
14	Q Did you ever own it?	10:02:49
15	A Did I ever own it?	10:02:52
16	Q Yes.	10:02:54
17	A I mean, my wife Angela and I did.	10:02:54
18	Q When did you sell it?	10:02:57
19	A I want to say three or four years ago.	10:02:59
20	Q Mr. Svonavec, I'm handing you something	10:03:18
21	from your criminal case. We're not going to dwell	10:03:21
22	on this subject very long. We are going -- I do	10:03:25
23	have a few questions for you about it. You can	10:03:28
24	review this document and let me know when you're	10:03:30
25	done.	10:03:33

Transcript of Jason Svonavec  
Conducted on November 5, 2024

13

1	A (Witness reviews document.)	10:03:35
2	All right.	10:03:41
3	Q Have you seen this document before?	10:03:41
4	A Yes.	10:03:43
5	Q When did you see this document?	10:03:43
6	A I don't know.	10:03:46
7	Q Does this document show that you're	10:03:48
8	requesting to be housed at FPC Morgantown,	10:03:57
9	Morgantown, West Virginia --	10:04:02
10	MR. PHILLIPS: Objection to the form of	10:04:03
11	the question. The document speaks for itself.	10:04:06
12	Q You can answer, Mr. Svonavec.	10:04:09
13	A That's what the document shows.	10:04:10
14	Q Why did you request FPC Morgantown?	10:04:12
15	A It's just what we requested.	10:04:17
16	Q Did you ever consider a place in	10:04:19
17	California?	10:04:24
18	A No.	10:04:25
19	Q Did you ever consider a place in Florida?	10:04:26
20	A No.	10:04:29
21	Q Why did you not consider a place in	10:04:31
22	Florida?	10:04:35
23	A I don't know.	10:04:37
24	Q Where does Angela reside?	10:04:39
25	A Florida.	10:04:47

Transcript of Jason Svonavec  
Conducted on November 5, 2024

14

1	Q Are you -- strike that.	10:04:48
2	Are you and Angela still living together?	10:05:01
3	A We're still married.	10:05:06
4	MR. PHILLIPS: Objection as to asked and	10:05:08
5	answered.	10:05:10
6	Q That wasn't an answer to my question,	10:05:13
7	Mr. Svonavec. Are you and Angela still residing	10:05:16
8	in the same house?	10:05:19
9	A Angela resides in Florida. She's a	10:05:21
10	Florida resident. I reside in Pennsylvania. So	10:05:25
11	when I go see her or when she comes to see me,	10:05:28
12	then we do reside in the same house. But	10:05:32
13	when we -- when she's in Florida and I'm in	10:05:37
14	Pennsylvania, then we do not.	10:05:39
15	Q Why would you request a prison location	10:05:46
16	that is not near the residency of your wife?	10:05:53
17	MR. ZATKO: Objection.	10:05:56
18	MR. PHILLIPS: I object. Sorry. This is	10:05:58
19	invading attorney-client privilege.	10:06:00
20	MR. TOWNSEND: Okay. And I would -- I	10:06:01
21	would request that only one of you --	10:06:03
22	MR. PHILLIPS: I'm sorry.	
23	MR. TOWNSEND: -- make the objections.	10:06:05
24	MR. ZATKO: Okay. I'll lay the objection	10:06:05
25	with that, given that I was counsel for	10:06:07



Transcript of Jason Svonavec  
Conducted on November 5, 2024

15

1	Mr. Svonavec in the criminal case.	10:06:09
2	MR. TOWNSEND: All right. So which one of	10:06:10
3	you is going to be asking the question? I just	10:06:12
4	need to be clear. We need a clean record.	10:06:15
5	MR. PHILLIPS: Sure. Matt will speak to	10:06:18
6	this objection.	10:06:19
7	MR. TOWNSEND: And going forward, who is	10:06:20
8	going to be doing the objections?	10:06:22
9	MR. PHILLIPS: I will be making speaking	10:06:22
10	objections moving forward.	10:06:24
11	MR. ZATKO: With respect to the objection	10:06:25
12	to the question of --	10:06:27
13	MR. TOWNSEND: I haven't asked you to lay	10:06:28
14	a record, Mr. Zatko. So your objection is noted	10:06:30
15	and I can clarify, but we don't need to hear any	10:06:33
16	more from you. Thank you.	10:06:36
17	MR. ZATKO: That's fine. It's a protected	10:06:37
18	answer.	10:06:44
19	MR. TOWNSEND: So -- well, are you	10:06:46
20	instructing Mr. Svonavec --	10:06:48
21	MR. PHILLIPS: We are instructing him not	10:06:49
22	to answer questions that invade on the	10:06:51
23	attorney-client privilege.	10:06:53
24	BY MR. TOWNSEND:	10:07:00
25	Q Mr. Svonavec, did you want to be located	10:07:01

Transcript of Jason Svonavec  
Conducted on November 5, 2024

16

1	near your home when you requested FPC Morgantown?	10:07:03
2	MR. PHILLIPS: Objection as to	10:07:08
3	attorney-client privilege.	10:07:10
4	MR. TOWNSEND: Dean, I'm not asking him	10:07:17
5	for any contents of any conversations that he's	10:07:19
6	had with counsel. I understand that's a	10:07:22
7	well-established rule. I'm not looking for that.	10:07:25
8	But that is a fact that would exist outside of his	10:07:29
9	conversations with counsel.	10:07:34
10	MR. PHILLIPS: I would ask you to rephrase	10:07:36
11	the question because to the extent his choice as	10:07:38
12	to where he would request to serve his prison	10:07:42
13	sentence was a conversation that he had amongst	10:07:46
14	his legal counsel on that particular matter. So	10:07:48
15	any questions about the decision-making as to	10:07:50
16	where he would be serving his prison sentence are	10:07:52
17	privileged.	10:07:55
18	BY MR. TOWNSEND:	10:07:58
19	Q Mr. Svonavec, was it a personal decision	10:07:58
20	of yours to request FPC Morgantown?	10:08:02
21	A My counsel recommended it.	10:08:07
22	MR. TOWNSEND: Okay. I'm going to mark	10:08:11
23	this as Exhibit 2.	10:08:18
24	(Exhibit 2 was marked for identification	10:08:20
25	and is attached to the transcript.)	10:08:24

Transcript of Jason Svonavec  
Conducted on November 5, 2024

17

1	MR. PHILLIPS: I would object to this	10:08:24
2	exhibit as to relevance.	10:08:26
3	Q All right. Mr. Svonavec, I'm handing you	10:08:43
4	a document. The first page of which is marked	10:08:44
5	as -- with Bates label Number 6.	10:08:48
6	MR. PHILLIPS: Thank you.	10:08:52
7	Q And please review this and let me know	10:08:55
8	when you're done reviewing it.	10:08:57
9	A (Witness reviews document.)	10:09:09
10	Okay.	10:09:12
11	Q Have you seen this document before,	10:09:21
12	Mr. Svonavec?	10:09:25
13	A Yes.	10:09:26
14	Q What is Jason's Interest, LLC?	10:09:27
15	A It's what my counsel and accounting firm	10:09:32
16	set up.	10:09:38
17	Q Does it own any businesses?	10:09:41
18	A I think it still does, but I'm not real	10:09:47
19	sure what it owns.	10:09:52
20	Q You say "it still does." Did it own	10:09:56
21	something in the past that it doesn't own anymore?	10:10:00
22	A Yes.	10:10:03
23	Q What was that?	10:10:03
24	A Banshee Industries. I believe Fearless	10:10:04
25	Leasing, but I'm not 100 percent sure. I leave	10:10:14

Transcript of Jason Svonavec  
Conducted on November 5, 2024

18

1	all that up to my legal and my accountant.	10:10:17
2	Q This says in this first paragraph that	10:10:24
3	this is entered into between Jason Svonavec and	10:10:29
4	Jason's Interest, LLC; is that right?	10:10:32
5	A Yes.	10:10:34
6	Q And that's you, Jason?	10:10:35
7	A Yes.	10:10:37
8	Q And did you own Jason's Interest, LLC?	10:10:37
9	A Yes.	10:10:41
10	Q Were you the sole owner of Jason's	10:10:41
11	Interest, LLC on the date of this document?	10:10:43
12	A Yes.	10:10:46
13	Q So you were -- well, let me back up.	10:10:47
14	And this document purports to assign your	10:11:02
15	membership interest in Banshee Industries, LLC to	10:11:05
16	Jason's Interest, LLC; is that correct?	10:11:07
17	MR. PHILLIPS: I would object to the form	10:11:10
18	of the question and state that the document speaks	10:11:12
19	for itself.	10:11:13
20	But you can answer, Jason.	10:11:14
21	A You know, that's -- that's how it says.	10:11:16
22	Q So why did you transfer property from	10:11:20
23	yourself to an LLC that you owned?	10:11:24
24	MR. PHILLIPS: Objection. Attorney-client	10:11:28
25	privilege. Jason states that he relied on his	10:11:29

Transcript of Jason Svonavec  
Conducted on November 5, 2024

19

1	accountants and attorneys in regards to this	10:11:33
2	matter and the information as to why is	10:11:36
3	privileged.	10:11:38
4	MR. TOWNSEND: So are you instructing	10:11:41
5	Mr. Svonavec not to answer that question, Dean?	10:11:43
6	MR. PHILLIPS: Could you restate it for	10:11:47
7	me?	10:11:48
8	MR. TOWNSEND: Well, you just objected to	10:11:50
9	it. I think --	10:11:51
10	MR. PHILLIPS: If you want to restate the	10:11:51
11	question that was asked, no, I'm not -- I'm	10:11:52
12	requesting him not to answer that. But if you	10:11:55
13	want to --	10:11:56
14	MR. TOWNSEND: Okay. Just being clear.	10:11:56
15	So you're instructing him not to answer?	10:11:58
16	MR. PHILLIPS: Yes.	10:12:01
17	MR. TOWNSEND: Okay.	10:12:01
18	BY MR. TOWNSEND:	10:12:02
19	Q Mr. Svonavec, you can flip to the second	10:12:03
20	page of this document. Do you see where there's a	10:12:06
21	signature below the word "signor"?	10:12:10
22	A Yes.	10:12:15
23	Q Is that your signature?	10:12:15
24	A Yes.	10:12:16
25	Q And did you affix your signature to this	10:12:17

Transcript of Jason Svonavec  
Conducted on November 5, 2024

20

1	document?	10:12:21
2	MR. PHILLIPS: Objection. Asked and	10:12:22
3	answered.	10:12:23
4	A Did -- did I sign it?	10:12:26
5	Q Yes.	10:12:27
6	A Yes.	10:12:28
7	Q And did you also sign underneath the words	10:12:28
8	"Jason Interests" -- "Jason's Interest, LLC"?	10:12:33
9	A Yes.	10:12:36
10	Q What is Banshee Industries, LLC?	10:12:37
11	A A company that sells house coal and mulch	10:12:48
12	and stone and does repairs on equipment and stuff.	10:12:56
13	Q And did it have -- correct me if I'm	10:13:02
14	wrong, it's off the top of my head, but it had the	10:13:06
15	name Heritage House Coal, LLC previously; is that	10:13:10
16	right?	10:13:14
17	A I believe so. Several years ago.	10:13:14
18	Q Why did you create Heritage House Coal,	10:13:15
19	LLC?	10:13:21
20	A That would be a question for my legal and	10:13:22
21	my accountants.	10:13:25
22	Q Why did you choose to sell house coal out	10:13:27
23	of Heritage House Coal, LLC?	10:13:31
24	MR. PHILLIPS: I would object to the form	10:13:34
25	of the question. I believe it's vague.	10:13:36

Transcript of Jason Svonavec  
Conducted on November 5, 2024

21

1	Q You can answer if --	10:13:40
2	MR. PHILLIPS: If you understand.	10:13:42
3	A I -- I don't really understand. It was	10:13:43
4	just something we've always done.	10:13:47
5	Q So you sold house coal before you created	10:13:48
6	Heritage House Coal, LLC?	10:13:52
7	A Yes.	10:13:54
8	Q Did you sell house coal to make money?	10:13:54
9	A Yes.	10:13:56
10	Q Okay. Do you work for Banshee Industries,	10:13:57
11	LLC today?	10:14:04
12	A Yes.	10:14:05
13	Q What do you do for Banshee Industries,	10:14:05
14	LLC?	10:14:10
15	A Just oversee all the operations.	10:14:10
16	Q Can -- what sort of operations?	10:14:14
17	A The selling of the coal, the repairs on	10:14:17
18	equipment. Mulch. Just -- just overseeing	10:14:21
19	everything with the company.	10:14:27
20	Q Does Banshee Industries, LLC have any	10:14:28
21	employees?	10:14:32
22	A Yes.	10:14:33
23	Q How many, approximately?	10:14:33
24	A I think around a dozen.	10:14:34
25	Q Does Angela work for Banshee Industries,	10:14:39

Transcript of Jason Svonavec  
Conducted on November 5, 2024

22

1	LLC?	10:14:43
2	A Yes.	10:14:43
3	Q What does Angela do?	10:14:44
4	A She -- she's the owner of Banshee. Takes	10:14:45
5	care of all the -- like oversees the office and	10:14:51
6	all the finance part of it. Financial part of it.	10:14:54
7	Q When you say "oversees the office," what	10:14:58
8	does that mean?	10:15:01
9	A I -- I don't really know. I just know	10:15:02
10	she -- if somebody at the office has a question or	10:15:07
11	they have to run something by her, they -- they	10:15:11
12	get ahold of her.	10:15:13
13	Q Does she collect the mail for Banshee	10:15:16
14	Industries, LLC?	10:15:19
15	A No.	10:15:19
16	Q Who does that?	10:15:20
17	A I'll either get it or another employee	10:15:21
18	will get it.	10:15:25
19	Q What is -- if you know, what is the	10:15:25
20	mailing address of Banshee Industries, LLC?	10:15:30
21	A 550 Beagle Road, Rockwood.	10:15:33
22	Q Why would Angela who oversees the office	10:15:39
23	not collect the mail for Banshee Industries, LLC?	10:15:45
24	MR. PHILLIPS: I would object as to	10:15:50
25	relevance.	10:15:51



Transcript of Jason Svonavec  
Conducted on November 5, 2024

23

1	A I don't know. I do not know. I don't	10:15:54
2	think anybody's ever talked about who's collecting	10:15:57
3	the mail.	10:16:00
4	MR. TOWNSEND: We're going to mark this	10:16:09
5	copy as Exhibit 3.	10:16:11
6	(Exhibit 3 was marked for identification	10:16:12
7	and is attached to the transcript.)	10:16:23
8	Q Who -- whose idea was it to create Jason's	10:16:23
9	Interest, LLC?	10:16:36
10	MR. PHILLIPS: Objection. Impeding on the	10:16:36
11	attorney-client privilege.	10:16:39
12	MR. TOWNSEND: So are you instructing him	10:16:42
13	not to answer that question?	10:16:44
14	MR. PHILLIPS: Yes.	10:16:45
15	Q All right. Mr. Svonavec, I'm going to be	10:17:22
16	handing you a document with the Bates label	10:17:23
17	beginning at 8.	10:17:27
18	MR. PHILLIPS: Thank you.	10:17:30
19	Q And please review this document for me and	10:17:33
20	let me know when you're done.	10:17:35
21	A (Witness reviews document.)	10:17:37
22	All right.	10:17:38
23	Q Have you seen this document before,	10:18:07
24	Mr. Svonavec?	10:18:10
25	A Yes.	10:18:10

Transcript of Jason Svonavec  
Conducted on November 5, 2024

24

1	Q Did -- when did you -- when was the last	10:18:11
2	time you saw this document?	10:18:15
3	A I don't recall.	10:18:16
4	Q And it says here in Paragraph 2 that the	10:18:17
5	name and address of the member is Jason Svonavec;	10:18:24
6	is that right?	10:18:28
7	A Yes.	10:18:28
8	Q All right. And the date of this -- this	10:18:30
9	was adopted on the 7th of August, 2023; is that	10:18:32
10	right?	10:18:36
11	A Yes.	10:18:36
12	Q So as of that date, you were the sole	10:18:37
13	member of Jason's Interest, LLC; is that correct?	10:18:41
14	A That's what it says.	10:18:46
15	Q Okay. Turn to the last page. Below the	10:18:47
16	word "member" there, is that your signature?	10:18:57
17	A Yes.	10:19:00
18	Q Did you sign this document?	10:19:00
19	A Yes.	10:19:02
20	Q Okay. Mr. Svonavec, do you see down at	10:19:02
21	the bottom right-hand corner of that last page	10:19:09
22	it's Bates label page 12, a doc ID?	10:19:12
23	A Yep.	10:19:17
24	Q So was this signed via DocuSign?	10:19:18
25	A I don't remember. It might have been.	10:19:22

Transcript of Jason Svonavec  
Conducted on November 5, 2024

25

1	MR. TOWNSEND: Okay. We'll mark this as	10:19:30
2	Exhibit 4. We'll put it aside for a moment.	10:19:31
3	(Exhibit 4 was marked for identification	10:19:32
4	and is attached to the transcript.)	
5	Q Mr. Svonavec, I'm handing you a page	10:19:54
6	that's marked as Bates label 13.	10:19:56
7	MR. PHILLIPS: Thank you.	10:19:59
8	Q Review it and let me know when you're done	10:20:04
9	reviewing.	10:20:06
10	A (Witness reviews document.)	10:20:08
11	Okay.	10:20:09
12	Q Okay. So do you see at the top it says	10:20:15
13	Title, Jason's Operating Agreement? Do you see	10:20:19
14	that?	10:20:23
15	A Yes.	10:20:23
16	Q And down in the section titled Document	10:20:23
17	History, we have a "sent for signature to Angela	10:20:27
18	Svonavec on August 14, 2023."	10:20:34
19	Do you see that?	10:20:36
20	A Yes.	10:20:37
21	Q And then the next line says "viewed by	10:20:37
22	Angela Svonavec on August 14, 2023."	10:20:41
23	You see that?	10:20:45
24	A Yes.	10:20:46
25	Q And finally it says "signed by Angela	10:20:46

Transcript of Jason Svonavec  
Conducted on November 5, 2024

26

1	Svonavec on August 14, 2023."	10:20:50
2	Do you see that?	10:20:51
3	A Yes.	10:20:52
4	Q So did Angela Svonavec sign Jason's	10:20:53
5	Operating Agreement?	10:20:58
6	A No. Angela don't sign for me.	10:21:00
7	Q Why does it say "signed by Angela	10:21:07
8	Svonavec" on this Dropbox sign audit trail?	10:21:09
9	A I would say I was probably somewhere and I	10:21:16
10	didn't have my laptop and I had them send it to	10:21:20
11	her laptop so I could sign it.	10:21:21
12	Q Where were you?	10:21:25
13	A I have no idea. I might have been in	10:21:27
14	Florida. I -- I don't recall where I was, but I	10:21:29
15	don't travel with my laptop.	10:21:33
16	Q How often do you travel down to Florida?	10:21:36
17	A Usually every weekend. Sometimes every	10:21:39
18	other.	10:21:44
19	Q But you don't travel with your laptop?	10:21:46
20	A No.	10:21:47
21	Q So if we were to go back and look and see	10:21:48
22	if August 14, 2023, is on a weekend, would that be	10:21:58
23	the reason why you didn't have your laptop on that	10:22:01
24	day?	10:22:03
25	A That's very well possible.	10:22:04

Transcript of Jason Svonavec  
Conducted on November 5, 2024

27

1	Q Did you have your phone on you?	10:22:10
2	A Yes.	10:22:13
3	Q Do you have DocuSign on your phone?	10:22:14
4	A I normally don't use my phone because I	10:22:16
5	can't see it. I always sign -- I always do the	10:22:18
6	DocuSign on a computer.	10:22:23
7	Q Do you use your phone for work?	10:22:26
8	A A little bit. Very little.	10:22:28
9	Q Do you use your E-mail on your phone for	10:22:36
10	work?	10:22:38
11	A Very little. I use my phone to call.	10:22:39
12	That's -- that's how I conduct work. I do very,	10:22:43
13	very little E-mails.	10:22:47
14	Q Do you know your -- well, let me back up.	10:22:58
15	Do you have a Gmail?	10:23:05
16	MR. PHILLIPS: Objection as to relevance.	10:23:07
17	A I don't know. I have one E-mail.	10:23:10
18	Q What's that E-mail?	10:23:17
19	A Jason@fearlessleasing.com.	10:23:18
20	Q Why would this document have to be signed	10:23:24
21	on a weekend?	10:23:28
22	MR. PHILLIPS: I would object that it	10:23:29
23	calls for speculation.	10:23:30
24	A I -- I don't know.	10:23:36
25	Q Why couldn't it have waited till you	10:23:37

Transcript of Jason Svonavec  
Conducted on November 5, 2024

28

1	returned to Pennsylvania to use your computer?	10:23:39
2	MR. PHILLIPS: I object again that it	10:23:42
3	calls for speculation.	10:23:43
4	A I don't know.	10:23:44
5	Q We saw previously, and you're -- you're	10:23:54
6	welcome to look at the document, that this was	10:23:56
7	adopted on August 7, 2023; is that right?	10:23:57
8	A That's what it says.	10:24:03
9	Q But here it says it was signed on August	10:24:04
10	14, 2023; right?	10:24:07
11	A Yes.	10:24:09
12	Q So there was a whole week between the	10:24:10
13	adoption date and the signing date; right?	10:24:14
14	MR. PHILLIPS: Objection. Asked and	10:24:15
15	answered.	10:24:16
16	A Yes.	10:24:18
17	Q Why wasn't it signed before you left for	10:24:20
18	Florida?	10:24:23
19	MR. PHILLIPS: Objection. Calls for	10:24:24
20	speculation.	
21	A I guess that's just when I got to it.	10:24:26
22	Q Who sent this document to you?	10:24:35
23	A My counsel.	10:24:37
24	Q Who is your counsel?	10:24:38
25	A Morella. Gabby Morella.	10:24:40

Transcript of Jason Svonavec  
Conducted on November 5, 2024

29

1	MR. TOWNSEND: We will mark this as	10:24:54
2	Exhibit 5.	10:24:57
3	(Exhibit 5 was marked for identification	10:25:01
4	and is attached to the transcript.)	10:25:15
5	Q Mr. Svonavec, where is Morella &	10:25:15
6	Associates located?	10:25:21
7	MR. PHILLIPS: Objection. Relevance.	10:25:22
8	A Pittsburgh.	10:25:26
9	Q What's -- when was the last time you were	10:25:27
10	there?	10:25:29
11	MR. PHILLIPS: Objection. Relevance.	10:25:30
12	A I don't know.	10:25:34
13	Q Have you been there in the last two	10:25:36
14	months?	10:25:38
15	MR. PHILLIPS: Objection. Relevance.	10:25:39
16	A I don't recall.	10:25:42
17	Q Do you recall signing a declaration in	10:25:48
18	this case?	10:25:51
19	A I -- I don't. I don't know if I did or I	10:25:53
20	didn't.	10:25:58
21	Q So your testimony is you don't know if you	10:25:58
22	did or didn't sign the declaration in the matter	10:26:02
23	of Banshee Industries, LLC versus Heritage Coal &	10:26:04
24	Natural Resources, LLC?	10:26:12
25	A I don't even know what that is.	10:26:13

Transcript of Jason Svonavec  
Conducted on November 5, 2024

30

1	Q Well, have you signed any document in	10:26:15
2	relation to this case, Mr. Svonavec?	10:26:17
3	A No.	10:26:19
4	Q Did Angela sign any documents in this	10:26:19
5	case?	10:26:32
6	A That would be a question for Angela.	10:26:32
7	Q Mr. Svonavec, I understand that you	10:26:50
8	purported to transfer your interests -- ownership	10:26:56
9	interests in Banshee Industries, LLC to Angela; is	10:26:59
10	that right?	10:27:03
11	A Yes.	10:27:03
12	MR. PHILLIPS: I would object to that as	10:27:04
13	argumentative.	10:27:07
14	Q When did this transfer take place?	10:27:11
15	A I don't recall the date.	10:27:17
16	Q Was it in the last year?	10:27:19
17	A Yes.	10:27:21
18	Q Was it warm out when you -- if you recall?	10:27:22
19	A I don't remember.	10:27:27
20	Q Why did you transfer the interest in	10:27:28
21	Banshee LL -- Industries, LLC?	10:27:34
22	MR. PHILLIPS: I would object that it	10:27:37
23	impedes on the attorney-client privilege. I'm	10:27:39
24	instructing Jason not to answer the question.	10:27:44
25	Q Was it a gift to Angela, the transfer?	10:27:52



Transcript of Jason Svonavec  
Conducted on November 5, 2024

31

1	MR. PHILLIPS: Objection. Calls for a	10:27:54
2	legal conclusion.	10:27:55
3	Q You can answer.	10:27:59
4	MR. PHILLIPS: I would also object that	10:27:59
5	it's spousal privilege, asking questions about	10:28:01
6	conversations between a married couple.	10:28:04
7	MR. TOWNSEND: Are you instructing him not	10:28:10
8	to answer, Dean?	10:28:11
9	MR. PHILLIPS: Yes.	10:28:12
10	Q Did Angela give you anything in exchange	10:28:20
11	for you giving her Banshee Industries, LLC?	10:28:23
12	MR. PHILLIPS: I would object again on the	10:28:25
13	issue of the spousal privilege that it's asking	10:28:26
14	for communications between a married couple.	10:28:29
15	MR. TOWNSEND: Not asking for	10:28:32
16	communications.	10:28:35
17	Q Was there any property you gave her? You	10:28:35
18	can answer.	10:28:39
19	A Not -- not that I can remember. But I	10:28:40
20	don't recall.	10:28:47
21	Q All right. So I'm handing you a document	10:28:53
22	that's marked with Bates label page 14.	10:28:55
23	MR. PHILLIPS: Thank you.	10:29:04
24	Q Have you seen this document before --	10:29:10
25	well, I'm sorry, Mr. Svonavec. Go ahead and	10:29:12

Transcript of Jason Svonavec  
Conducted on November 5, 2024

32

1	review it and let me know when you're done.	10:29:14
2	A (Witness reviews document.)	10:29:19
3	Yes.	10:29:20
4	Q All right. In this first paragraph it	10:29:32
5	says that the membership interest assignment	10:29:37
6	agreement is between Jason's Interest, LLC and	10:29:40
7	Angela Svonavec; is that right?	10:29:44
8	A Yes.	10:29:45
9	Q And it's effective 1st day of June 2024;	10:29:46
10	right?	10:29:50
11	A That's what it says.	10:29:50
12	Q Were you the sole owner of Jason's	10:29:52
13	Interest, LLC on June 1st of 2024?	10:29:57
14	MR. PHILLIPS: I would object that that's	10:29:59
15	been asked and answered.	10:30:00
16	A That's what it says here.	10:30:03
17	Q Well, I understand that that's what it	10:30:05
18	says on this document, but do you recall if you	10:30:07
19	were the owner on that date? Is this document	10:30:10
20	correct?	10:30:13
21	A If that's what the document says, then	10:30:13
22	yes.	10:30:15
23	Q Okay. In about the middle of this page	10:30:16
24	it's marked as Paragraph 2, you can see that. It	10:30:28
25	says "Assignor hereby assigns, transfers and	10:30:31

Transcript of Jason Svonavec  
Conducted on November 5, 2024

33

1	conveys a membership" -- "membership interest of	10:30:35
2	the company to assignee and assignee hereby	10:30:37
3	accepts the membership interest of the company	10:30:40
4	from assignor."	10:30:42
5	Did I read that right?	10:30:43
6	A That's what it says.	10:30:46
7	Q So this document is purporting to cause	10:30:47
8	Jason's Interest, LLC to transfer Banshee	10:30:54
9	Industries, LLC to Angela Svonavec; is that right?	10:30:58
10	A It seems like it to me. I -- this is all	10:31:02
11	stuff that my attorneys take care of.	10:31:07
12	Q But you -- you've seen this document	10:31:13
13	before; correct?	10:31:14
14	A Yes.	10:31:15
15	Q Did you read it?	10:31:15
16	A Yes.	10:31:16
17	Q And on the second page of this document,	10:31:17
18	below "Jason's Interest, LLC," there's a signature	10:31:23
19	there.	10:31:26
20	Do you see that?	10:31:27
21	A Yes.	10:31:27
22	Q And did you sign this document on that	10:31:28
23	signature line?	10:31:31
24	A Yes.	10:31:33
25	Q Flipping back to Page 14. It says in	10:31:33

Transcript of Jason Svonavec  
Conducted on November 5, 2024

34

1	about the very middle "Now, therefore, for good	10:31:37
2	and valuable consideration, the receipt and	10:31:41
3	sufficiency of which is hereby acknowledged, and	10:31:43
4	intending to be legally bound, the parties agree	10:31:45
5	as follows."	10:31:48
6	Do you see that language?	10:31:50
7	A Yes.	10:31:51
8	Q What was the good and valuable	10:31:51
9	consideration?	10:31:53
10	MR. PHILLIPS: Objection. It calls for a	10:31:53
11	legal conclusion.	10:31:55
12	A From my attorney. I don't know. From my	10:31:59
13	attorneys and my -- my accountants.	10:32:02
14	Q But you entered this agreement; right?	10:32:05
15	A I didn't write the agreement.	10:32:07
16	Q But you signed it; right?	10:32:09
17	A Yes.	10:32:10
18	Q So you agree to follow the contract you	10:32:10
19	signed; correct?	10:32:16
20	MR. PHILLIPS: Objection. Asked and	10:32:16
21	answered.	10:32:18
22	A Correct.	10:32:19
23	Q So what was the consideration you were	10:32:22
24	going to give Angela?	10:32:31
25	MR. PHILLIPS: I object, that it calls for	10:32:33

Transcript of Jason Svonavec  
Conducted on November 5, 2024

35

1	a legal conclusion. Object that it calls for	10:32:34
2	information protected by the spousal privilege.	10:32:37
3	MR. TOWNSEND: Dean, the consideration is	10:32:42
4	not a communication. It's a piece of property or	10:32:45
5	non-property. So I would disagree with your	10:32:49
6	objection that anything is privileged that would	10:32:54
7	fall under this iteration.	10:32:56
8	MR. PHILLIPS: The issue of consideration	10:32:59
9	is a legal conclusion, whether consideration is or	10:33:02
10	is not present in a contract --	10:33:06
11	MR. TOWNSEND: Well and good, but that's	10:33:07
12	not a spousal question. You're -- you're changing	10:33:08
13	your objection. Which one are you --	10:33:11
14	MR. PHILLIPS: There's two objections.	10:33:12
15	There is an objection as to calling for a legal	10:33:13
16	conclusion and there's an objection in that it	10:33:15
17	seeks to invade upon a communication between a	10:33:17
18	husband and wife.	10:33:19
19	MR. TOWNSEND: Sure. But you can't	10:33:20
20	instruct him not to answer based on an objection	10:33:23
21	over a legal conclusion.	10:33:26
22	MR. PHILLIPS: I've -- I've not instructed	10:33:27
23	him not to answer. I'm stating my objections.	10:33:28
24	BY MR. TOWNSEND:	10:33:31
25	Q All right. Well, then, Mr. Svonavec, if	10:33:31

Transcript of Jason Svonavec  
Conducted on November 5, 2024

36

1	you could get off your phone and if you could	10:33:32
2	answer my question. What was the consideration	10:33:35
3	that you gave to Angela Svonavec in this contract?	10:33:38
4	A It looks like Jason's Interest.	10:33:43
5	Q What did Jason's Interest give as	10:33:45
6	consideration of this contract?	10:33:48
7	A Whatever Jason's Interest owned.	10:33:50
8	Q What did Jason's Interest own?	10:33:53
9	A That -- I'd have to get all that info from	10:33:55
10	my attorneys because I don't have that off the top	10:33:59
11	of my head.	10:34:02
12	Q So you signed this contract not knowing	10:34:03
13	what Jason's Interest, LLC was giving Angela	10:34:04
14	Svonavec. Is that your testimony?	10:34:09
15	MR. PHILLIPS: I would object that that's	10:34:10
16	argumentative.	10:34:12
17	A When I signed this contract, my attorneys	10:34:13
18	would have told me what all Jason's Interest	10:34:15
19	owned. And so at that time, yes, I would have	10:34:16
20	known, but I don't memorize that in my head.	10:34:20
21	Q So this contract was -- has an effective	10:34:23
22	date of the 1st of June; right?	10:34:26
23	A Yes.	10:34:30
24	Q So that's about four months ago?	10:34:31
25	A Yes.	10:34:33

Transcript of Jason Svonavec  
Conducted on November 5, 2024

37

1	Q And so you don't remember what Jason's	10:34:34
2	Interest, LLC transferred to Angela from four	10:34:38
3	months ago?	10:34:40
4	MR. PHILLIPS: Objection. Asked and	10:34:41
5	answered.	10:34:42
6	A Whatever Jason's Interest owned, like I've	10:34:44
7	told you. I know -- I know one of them was	10:34:47
8	Banshee Industries. I think it's Fearless	10:34:49
9	Leasing, but I don't have all -- for me to	10:34:53
10	honestly truthfully answer you the exact question,	10:34:57
11	I can't. I know there's some things in there, but	10:34:59
12	I don't know what they all are.	10:35:02
13	Q So for clarification, was it everything	10:35:04
14	that Jason's Interest owned was transferred to	10:35:07
15	Angela?	10:35:09
16	A That is correct.	10:35:10
17	Q Okay.	10:35:11
18	A I believe I said that. Everything that	10:35:12
19	Jason's Interest owned.	10:35:14
20	Q What did Angela Svonavec give to Jason's	10:35:18
21	Interest, LLC?	10:35:23
22	MR. PHILLIPS: I would object in that it	10:35:23
23	calls for a legal conclusion. I would also state	10:35:25
24	that I object that it invades upon the spousal	10:35:27
25	privilege, but I'm not instructing Jason not to	10:35:31

Transcript of Jason Svonavec  
Conducted on November 5, 2024

38

1	answer.	10:35:33
2	So Jason, you can answer.	10:35:33
3	A Nothing.	10:35:36
4	MR. TOWNSEND: Okay. We can mark this as	10:35:36
5	Exhibit 6.	10:35:43
6	(Exhibit 6 was marked for identification	10:35:44
7	and is attached to the transcript.)	10:35:49
8	Q Mr. Svonavec, I'm marking -- giving you	10:35:49
9	the document with Bates label 363, starting with	10:36:08
10	363.	10:36:13
11	MR. PHILLIPS: Thank you.	10:36:14
12	Q And I'll represent to you, Mr. Svonavec,	10:36:23
13	that these are not consecutive pages. The rest of	10:36:25
14	the pages were redacted and just to save a tree, I	10:36:29
15	didn't print them all out.	10:36:33
16	Can you please review what I've handed you	10:36:35
17	and let me know when you're done.	10:36:37
18	A Yes. (Witness reviews document.)	10:36:39
19	Q So do you recognize the non-redacted	10:36:42
20	portion of this first page?	10:36:44
21	A I mean, it looks like a tax return.	10:36:45
22	Q Is it the 2022 income tax return filed by	10:36:53
23	you and Angela?	10:36:59
24	A Yes.	10:37:00
25	Q And do you see that it says the box	10:37:00



Transcript of Jason Svonavec  
Conducted on November 5, 2024

39

1	towards the top left-hand corner is marked X for	10:37:04
2	married, filed jointly.	10:37:08
3	Do you see that?	10:37:10
4	A Yes.	10:37:10
5	Q Why did you file a tax return jointly with	10:37:11
6	Angela?	10:37:16
7	A You'd have to ask my accountants.	10:37:16
8	Q Did you ever discuss that with your	10:37:19
9	accountants?	10:37:27
10	A I don't recall.	10:37:29
11	Q Did you discuss the contents of this tax	10:37:30
12	return with your accountants?	10:37:34
13	A I don't recall.	10:37:35
14	Q Did you review your tax return with your	10:37:36
15	accountants?	10:37:40
16	A I don't recall.	10:37:40
17	Q Did you sign this tax return?	10:37:41
18	A I'm sure I did.	10:37:45
19	Q So you signed it, but you don't recall if	10:37:46
20	you reviewed it?	10:37:49
21	MR. PHILLIPS: Objection. Asked and	10:37:50
22	answered.	
23	A Yes.	
24	Q The address here is 192 Stone Ridge Lane.	10:37:58
25	Do you see that?	10:38:01

Transcript of Jason Svonavec  
Conducted on November 5, 2024

40

1	A Yes.	10:38:01
2	Q And is that where you presently live?	10:38:02
3	A Yes.	10:38:08
4	Q How long have you lived there?	10:38:09
5	A Since 2017 or 2018. Right around there.	10:38:13
6	Q Did you ever take out a mortgage on this	10:38:19
7	property?	10:38:31
8	A No.	10:38:31
9	Q Have you taken out a mortgage on -- well,	10:38:32
10	we'll strike that for now.	10:38:40
11	If you could flip to the third page,	10:38:42
12	Mr. Svonavec. Do you recognize the non-redacted	10:38:47
13	portion of this page?	10:38:53
14	A Yes.	10:38:54
15	Q And is this document your 2022	10:38:57
16	Pennsylvania income tax return that you filed with	10:39:00
17	Angela?	10:39:03
18	A Yes.	10:39:03
19	Q Okay. And it says -- on the right-hand	10:39:04
20	column, there's a few different letters.	10:39:12
21	Do you see those different letters?	10:39:15
22	A Yes.	10:39:17
23	Q Y, R, M, N? The third one down, if you	10:39:18
24	see it, is marked as M.	10:39:23
25	Do you see that?	10:39:25

Transcript of Jason Svonavec  
Conducted on November 5, 2024

41

1	A Yes.	10:39:26
2	Q And if we look at the instructions, it	10:39:27
3	says that M means married, filing separately.	10:39:30
4	Would you agree?	10:39:36
5	A That's what it says. Yes.	10:39:37
6	Q So you filed your Pennsylvania 2022 income	10:39:38
7	tax returns married filing separately?	10:39:42
8	A That's what it says.	10:39:45
9	Q But you filed your -- well, I mean, did	10:39:46
10	you do that?	10:39:49
11	A I don't know. That's a question for my	10:39:50
12	accountant.	10:39:51
13	Q So you don't know -- well, did you review	10:39:52
14	this tax return before it was filed?	10:39:58
15	A I don't recall if I did or not.	10:40:00
16	Q So where would your accountants get the	10:40:02
17	information for whether or not to mark you as	10:40:09
18	married filing separately if --	10:40:13
19	MR. PHILLIPS: Objection. Calls for	10:40:14
20	speculation.	10:40:17
21	A Ask my accountants.	10:40:17
22	Q All right. It sounds like we will.	10:40:20
23	A That's good.	10:40:21
24	Q Great.	10:40:22
25	MR. TOWNSEND: We will talk about that but	10:40:24

Transcript of Jason Svonavec  
Conducted on November 5, 2024

42

1	we'll be probably issuing a subpoena for the	10:40:26
2	accountants to give their testimony in this case.	10:40:28
3	MR. PHILLIPS: Understood.	10:40:31
4	Q Okay. So you file your federal tax return	10:40:33
5	as married filing joint but your state tax return	10:40:39
6	as married filing separate -- separately; right?	10:40:43
7	MR. PHILLIPS: I would object. That's	10:40:46
8	been asked and answered.	10:40:48
9	A Ask my accountants.	10:40:49
10	Q I'm asking you, based on what we just	10:40:53
11	read, is that right?	10:40:55
12	A I'm not gonna answer it because I don't	10:40:56
13	know. That's why I'm telling you to ask my	10:40:58
14	accountants. I was told to answer everything	10:41:00
15	truthfully here; correct? That's why I'm telling	10:41:03
16	you to ask the accountants because I do not know.	10:41:05
17	Q So, you know, these pages that we just	10:41:09
18	reviewed are not accurate?	10:41:12
19	MR. PHILLIPS: I would object. That's	10:41:14
20	argumentative. Mischaracterizing the answer. The	10:41:17
21	question's been asked and answered. I think going	10:41:19
22	down this path any further may borderline on	10:41:22
23	harassment.	10:41:29
24	Q Why would one tax return be marked as	10:41:32
25	married filing jointly but the other tax return be	10:41:38

Transcript of Jason Svonavec  
Conducted on November 5, 2024

43

1	marked as married filing separately, if you know?	10:41:41
2	A I don't know.	10:41:45
3	MR. TOWNSEND: Okay. We will mark this	10:41:46
4	exhibit that we've been looking at Exhibit 7.	10:42:03
5	(Exhibit 7 was marked for identification	10:42:06
6	and is attached to the transcript.)	10:42:16
7	Q Okay. Next one, Mr. Svonavec, is -- I'm	10:42:16
8	handing you what's listed as Bates label 1352 as	10:42:23
9	the first page.	10:42:30
10	MR. PHILLIPS: Thank you.	10:42:33
11	Q And if you can review this document and	10:42:41
12	let me know when you're done reviewing it.	10:42:42
13	A Yes.	10:42:46
14	Q All right. Now, I understand your prior	10:42:47
15	testimony regarding your 2022 tax return. For	10:42:50
16	this tax return, which is 2019, did you review the	10:42:54
17	contents of your 2019 tax return before it was	10:42:58
18	filed?	10:43:00
19	A I'm sure I probably did.	10:43:01
20	Q On the second page here, which is Bates	10:43:02
21	label 1359, there's an amount for home mortgage	10:43:13
22	interest and points recorded to you on Form 1098	10:43:17
23	of 30,794. Do you see that?	10:43:21
24	A Yes.	10:43:25
25	Q So what was the home associated with the	10:43:25

Transcript of Jason Svonavec  
Conducted on November 5, 2024

44

1	home mortgage interest of 30,794?	10:43:28
2	A I don't know.	10:43:32
3	Q Did you have any mortgage for the tax year	10:43:33
4	2019?	10:43:42
5	A Not that I can recall.	10:43:44
6	Q Is -- is the amount of 30,794 not	10:43:45
7	accurate?	10:43:55
8	MR. PHILLIPS: Objection. Argumentative.	10:43:56
9	A You'd have to ask my accountants that	10:43:59
10	also.	10:44:02
11	Q But, Mr. Svonavec, you provided	10:44:03
12	information to your accountants for them to	10:44:06
13	prepare the tax return -- your tax returns; right?	10:44:10
14	A Yes.	10:44:12
15	Q So did you provide them the information	10:44:13
16	for the home mortgage interest?	10:44:17
17	A I don't know what I provided them five	10:44:19
18	years ago. That's why I said to ask them.	10:44:21
19	Q About \$31,000 in interest is a lot of	10:44:25
20	interest; would you agree?	10:44:38
21	MR. PHILLIPS: Objection. Relevance.	10:44:40
22	A Probably not.	10:44:43
23	Q That would reflect a loan well over a	10:44:50
24	quarter million dollars?	10:44:54
25	MR. PHILLIPS: Objection.	10:44:56

Transcript of Jason Svonavec  
Conducted on November 5, 2024

45

1	Q Under 2019 dollars; would you agree?	10:44:59
2	MR. PHILLIPS: Objection.	10:45:03
3	A I don't know.	
4	Q So your testimony is you don't know if the	10:45:07
5	home mortgage interest you filed to the IRS is	10:45:11
6	associated with 192 Stone Ridge Lane?	10:45:17
7	MR. PHILLIPS: Objection. It's not a	10:45:21
8	question.	10:45:22
9	A You're going to have to ask my accountants	10:45:27
10	this.	10:45:29
11	Q Well --	10:45:30
12	A You know, I'm lost with all this. That's	10:45:30
13	why I hire professionals to do this, so I'm not	10:45:32
14	going to answer something because I don't know.	10:45:35
15	Q How many homes did you own in the tax year	10:45:39
16	of 2019?	10:45:42
17	MR. PHILLIPS: Objection. Relevance.	10:45:43
18	A I don't know if I had two or three at that	10:45:49
19	time.	
20	Q Okay. Can you list them out for me?	10:45:52
21	A Well, 192 Stone Ridge and the two homes in	10:45:54
22	Florida. But I don't know if I had both homes in	10:45:59
23	Florida in 2019 or not.	10:46:03
24	Q And which were those two in Florida?	10:46:05
25	A Actually, I have three homes in Florida.	10:46:07

Transcript of Jason Svonavec  
Conducted on November 5, 2024

46

1	Portside. I don't know the address on the other	10:46:12
2	two. I -- I don't recall the address.	10:46:18
3	Q What county were they located --	10:46:26
4	A They were in Naples, Florida.	10:46:28
5	Q Both of them?	10:46:29
6	A Yeah.	10:46:30
7	Q But you said there may have been a third	10:46:31
8	in Florida; is that --	10:46:35
9	A Now there's a third in Florida, but there	10:46:36
10	wouldn't have been a third in 2019.	10:46:39
11	MR. TOWNSEND: Okay. That is all we have	10:46:41
12	for that exhibit. I'm marking that one.	10:46:46
13	(Exhibit 8 was marked for identification	10:46:54
14	and is attached to the transcript.)	10:47:13
15	Q Okay. Mr. Svonavec, I'm handing you a	10:47:13
16	page that's Bates labeled 1844.	10:47:15
17	MR. PHILLIPS: Thank you.	10:47:21
18	Q Let me know when you're done reviewing it.	10:47:30
19	A (Witness reviews document.)	10:47:33
20	Yep.	10:47:33
21	Q Have you seen this document before, if you	10:47:34
22	recall?	10:47:38
23	A Not that I recall.	10:47:38
24	Q Are you familiar with TriState Capital	10:47:39
25	Bank?	10:47:48



Transcript of Jason Svonavec  
Conducted on November 5, 2024

47

1	A Not that I recall.	10:47:48
2	Q And this was sent to Angela Svonavec at	10:47:49
3	550 Beagle Road; is that right?	10:47:55
4	A That's what it says.	10:47:57
5	Q And it's for the 2019 loan interest	10:47:58
6	statement; is that right?	10:48:02
7	A That's what it says.	10:48:03
8	Q We have a note date, and you see this	10:48:05
9	towards the middle, of April 3rd of 2019. Do you	10:48:08
10	see that?	10:48:11
11	A Yes.	10:48:11
12	Q Do you remember taking out a note on April	10:48:11
13	3rd of 2019?	10:48:16
14	A No.	10:48:18
15	Q Would Angela have taken out the note?	10:48:18
16	MR. PHILLIPS: Objection. Calls for	10:48:21
17	information that's privileged under the spousal	10:48:23
18	privilege.	10:48:26
19	MR. TOWNSEND: Dean, are you instructing	10:48:34
20	him not to answer?	10:48:36
21	MR. PHILLIPS: No.	10:48:37
22	You can answer the question, Jason.	10:48:37
23	A You would have to ask Angela that.	10:48:39
24	Q Okay. So Angela -- your testimony is	10:48:41
25	that -- well, I don't know if this is your	10:48:43

Transcript of Jason Svonavec  
Conducted on November 5, 2024

48

1	testimony. Let me back up.	10:48:44
2	Would Angela know whether or not there was	10:48:45
3	a note taken out on April 3, 2019?	10:48:50
4	MR. PHILLIPS: I would object that it	10:48:53
5	calls for speculation.	10:48:55
6	A I don't know if Angela would know.	10:49:03
7	Q Do you talk home finances with Angela?	10:49:05
8	MR. PHILLIPS: Objection. It's asking for	10:49:07
9	information that's privileged under the spousal	10:49:08
10	privilege. They're husband and wife. He does not	10:49:12
11	need to speak to what their communications are.	10:49:13
12	You don't have to answer that question,	10:49:15
13	Jason.	10:49:17
14	MR. TOWNSEND: We'll mark this as	10:49:25
15	Exhibit 9.	10:49:27
16	MR. PHILLIPS: I would object to the	10:49:27
17	exhibit that it hasn't been authenticated. Jason	10:49:28
18	doesn't recognize this document, but otherwise.	10:49:31
19	MR. TOWNSEND: I mean, Dean, you produced	10:49:33
20	this document to us when we asked for all	10:49:36
21	homeowners interest.	10:49:38
22	MR. PHILLIPS: Understood.	10:49:39
23	MR. TOWNSEND: So now you're objecting to	10:49:39
24	the authenticity of a document?	10:49:41
25	MR. PHILLIPS: At this deposition.	10:49:44

Transcript of Jason Svonavec  
Conducted on November 5, 2024

49

1	MR. TOWNSEND: Oh, so it's only not	10:49:46
2	authenticated at this deposition; is that your	10:49:46
3	testimony?	10:49:48
4	MR. PHILLIPS: I'm not testifying.	10:49:48
5	MR. TOWNSEND: Not testifying. I'm sorry.	10:49:52
6	Your statement.	10:49:54
7	MR. PHILLIPS: I just wanted to state that	10:49:54
8	objection on the record.	10:49:55
9	MR. TOWNSEND: All right. Well, given	10:49:56
10	that the authenticity of a document you produced	10:50:00
11	to us is then put into question by yourself, we	10:50:03
12	would ask that you go back and consult with your	10:50:06
13	clients to ensure that this document is authentic	10:50:09
14	and we would ask that you review the records again	10:50:16
15	to ensure that all Form 1098s from the tax years	10:50:20
16	that we requested are produced.	10:50:25
17	MR. PHILLIPS: Understood.	10:50:26
18	(Exhibit 9 was marked for identification	10:50:27
19	and is attached to the transcript.)	
20	Q Mr. Svonavec, when was the last time you	10:50:33
21	were in Florida?	10:50:41
22	A About a week or so ago.	10:50:44
23	Q How did you return -- how did you go from	10:50:48
24	Florida to here?	10:50:58
25	A Flew.	10:50:59

Transcript of Jason Svonavec  
Conducted on November 5, 2024

50

1	Q To speed this up a little, is it an	10:50:59
2	aircraft that you and Angela own that you use?	10:51:06
3	A Yes.	10:51:10
4	Q For the year 2024, did you use any other	10:51:11
5	means of transportation to get to Florida besides	10:51:21
6	that aircraft?	10:51:26
7	A Oh, Lord. Every once in a while I'll fly	10:51:30
8	with a friend of mine, but not very often. I	10:51:35
9	don't know if I did in '24 or not. I don't -- I	10:51:39
10	don't recall if I was with him at all on his	10:51:43
11	aircraft.	10:51:45
12	Q Did you ever drive from Florida to	10:51:45
13	Pennsylvania in 2024?	10:51:48
14	A No.	10:51:49
15	Q Did you ever use a commercial airline in	10:51:50
16	2024?	10:51:54
17	A No.	10:51:56
18	Q And we'll repeat these going the other	10:51:57
19	direction. In 2024, did you exclusively use the	10:52:03
20	aircraft that you and Angela owned to go from	10:52:10
21	Pennsylvania to Florida?	10:52:12
22	A As far as I can remember, yes.	10:52:15
23	Q And did you ever drive from Pennsylvania	10:52:16
24	to Florida?	10:52:19
25	A No.	10:52:20

Transcript of Jason Svonavec  
Conducted on November 5, 2024

51

1	Q Did you ever use a commercial airline?	10:52:20
2	A No.	10:52:23
3	Q When was, if you recall, the first time	10:52:23
4	you flew down to Florida in the year 2024?	10:52:34
5	A I don't recall. The first time I flew	10:52:37
6	back from Florida in '24 would have been January	10:52:44
7	1st. I always come back January 1st.	10:52:47
8	Q Okay. So you came -- you were down in	10:52:51
9	Florida and you flew back to Pennsylvania on	10:52:53
10	January 1st?	10:52:55
11	A Yes.	10:52:57
12	Q Okay. If you recall from there, when was	10:52:58
13	the next time you went down to Florida?	10:53:03
14	A I don't recall, but I more or less go -- I	10:53:06
15	don't -- I don't go every weekend. I at least go	10:53:11
16	every other weekend or at least about three	10:53:15
17	weekends a month or if I skip -- like if I skip a	10:53:19
18	weekend, I'll go down and stay for a week.	10:53:22
19	Q And this house in Florida, is it on	10:53:27
20	Clarendon Drive?	10:53:31
21	A Yes.	10:53:32
22	Q Okay. Do you keep an office at the house,	10:53:32
23	a personal office?	10:53:41
24	A Angie has an office there.	10:53:42
25	Q Do you also have an office at -- at the	10:53:46

Transcript of Jason Svonavec  
Conducted on November 5, 2024

52

1	house in Florida?	10:53:48
2	A Not really. I mean, I'll -- I'll use hers	10:53:50
3	if I need to.	10:53:53
4	Q When was the last time that Angela was in	10:53:56
5	Pennsylvania in the year 2024?	10:54:06
6	A Well, I don't -- I don't recall. It was	10:54:09
7	probably -- actually, I think she might have been	10:54:18
8	here for a week or so in October because of the	10:54:24
9	hurricane. And then after the hurricane she went	10:54:29
10	right back down.	10:54:31
11	Q Was it -- I forget when the hurricane was.	10:54:36
12	Do you remember when the hurricane was?	10:54:45
13	A It was around the beginning of October,	10:54:46
14	so somewhere in that neighborhood. There's been	10:54:47
15	so many of them this year, I don't know.	10:54:50
16	Q Does Angela -- did Angela in 2024 ever	10:54:54
17	drive from Florida to Pennsylvania?	10:55:04
18	A No.	10:55:06
19	Q Did she ever drive from Pennsylvania to	10:55:07
20	Florida?	10:55:10
21	A No.	10:55:11
22	Q Did she ever use a commercial airline	10:55:11
23	going from one state to the other?	10:55:16
24	A Not that I'm aware of.	10:55:19
25	Q Was the only means of transportation that	10:55:20

Transcript of Jason Svonavec  
Conducted on November 5, 2024

53

1	Angela used the aircraft that you and her own?	10:55:25
2	A Unless I would have used my friend's, like	10:55:28
3	if -- if our aircraft would have been down for	10:55:31
4	some maintenance or something.	10:55:34
5	Q Do you recall if you -- well, do you	10:55:36
6	recall if Angela used your friend's in 2024?	10:55:38
7	A I don't recall.	10:55:41
8	Q What is the airport that you use when you	10:55:45
9	fly into Pennsylvania?	10:56:07
10	A Somerset.	10:56:10
11	Q And what's the airport that you use when	10:56:12
12	you fly into Naples?	10:56:16
13	A Naples.	10:56:19
14	Q Are those the same airports that Angela	10:56:20
15	uses when she travels?	10:56:24
16	A Yes.	10:56:26
17	Q Do you know at least in 2024 if she used	10:56:26
18	any other airport in Florida?	10:56:32
19	MR. PHILLIPS: Objection, that it calls	10:56:36
20	for speculation.	
21	A I don't know.	10:56:40
22	Q Do you know for 2024 if Angela used any	10:56:41
23	other airport in Pennsylvania besides the one in	10:56:44
24	Somerset?	10:56:47
25	MR. PHILLIPS: Restate my objection as to	10:56:47

Transcript of Jason Svonavec  
Conducted on November 5, 2024

54

1	it calls for speculation.	10:56:49
2	A I -- I don't recall. There is times that	10:56:51
3	we can't get into Somerset if the weather's bad	10:56:54
4	and we'll have to go somewhere else.	10:56:57
5	Q When Angela's in Pennsylvania, does she	10:57:02
6	drive a car?	10:57:08
7	A Yes.	10:57:10
8	Q Does she own that car?	10:57:10
9	MR. PHILLIPS: Objection as to relevance.	10:57:14
10	A I don't know if she owns it or if the	10:57:19
11	company owns it.	10:57:21
12	Q Who's the company?	10:57:23
13	A Banshee.	10:57:23
14	Q Does it have a Pennsylvania license plate?	10:57:24
15	A Yes.	10:57:31
16	Q When Angela's in Pennsylvania, does she	10:57:32
17	pay for gas for the car, if you know?	10:57:46
18	A I don't know.	10:57:49
19	MR. TOWNSEND: Okay. We can go off the	10:58:08
20	record.	10:58:10
21	THE VIDEOGRAPHER: We are going off the	10:58:10
22	record. The time is 10:58.	10:58:12
23	(A recess was taken.)	10:58:19
24	THE VIDEOGRAPHER: We are back on the	11:07:32
25	record. The time is 11:07.	11:07:43



Transcript of Jason Svonavec  
Conducted on November 5, 2024

55

1	BY MR. TOWNSEND:	11:07:46
2	Q Mr. Svonavec, when was the last time --	11:07:46
3	well, hold on. Is Jason's Interest, LLC still an	11:07:52
4	existing LLC today?	11:07:56
5	A I think so, but I would want to ask my	11:07:59
6	attorneys and accountant.	11:08:03
7	Q When was the last time Jason's Interest,	11:08:05
8	LLC held a members meeting?	11:08:10
9	A I don't recall.	11:08:13
10	Q Has Jason's Interest, LLC ever held a	11:08:15
11	members meeting?	11:08:19
12	A I don't recall if we -- if I have or not.	11:08:20
13	Q When Jason's Interest, LLC assigned	11:08:24
14	Banshee Industries, LLC to Angela Svonavec, did --	11:08:38
15	did members of Jason's Interest, LLC vote to	11:08:45
16	ratify that agreement?	11:08:49
17	MR. PHILLIPS: I would object to the form	11:08:52
18	and that suggests there's multiple members. I	11:08:54
19	don't believe that we testified -- or Jason's	11:08:57
20	testified to that.	11:09:00
21	A Yeah, I'm the only member.	11:09:01
22	Q So did you meet to ratify Jason's	11:09:02
23	Interest, LLC -- that ratified the transfer of	11:09:09
24	Banshee Industries, LLC to Angela?	11:09:12
25	A Did I meet with myself or --	11:09:14

Transcript of Jason Svonavec  
Conducted on November 5, 2024

56

1	Q	Correct.	11:09:16
2	A	Yeah. I'm always by myself.	11:09:16
3	Q	Did you memorialize the ratification in	11:09:19
4		any documents for Jason's Interest, LLC?	11:09:24
5	A	I don't understand the question.	11:09:27
6	Q	Does Jason's Interest, LLC keep its own	11:09:29
7		books and records?	11:09:37
8	A	Yes.	11:09:38
9	Q	Who keeps those records?	11:09:38
10	A	I do. My attorneys.	11:09:43
11	Q	Does Jason's Interest, LLC have its own	11:09:45
12		bank account --	11:09:51
13	A	No.	11:09:52
14	Q	-- in its name?	11:09:52
15		How often do you update the books and	11:09:58
16		records of Jason's Interest, LLC? Well, strike	11:10:00
17		that.	11:10:04
18		When was the last time you updated the	11:10:04
19		books and records of Jason's Interest, LLC?	11:10:06
20	A	My accounting firm would have done that.	11:10:09
21	Q	Would you have provided the information to	11:10:12
22		do that?	11:10:14
23	A	I'm sure. But I -- I don't recall.	11:10:14
24	Q	Do you recall the approximate time when	11:10:21
25		that would have taken place?	11:10:24

Transcript of Jason Svonavec  
Conducted on November 5, 2024

57

1	A No.	11:10:25
2	Q Do you know who Laura Williams is?	11:10:26
3	MR. PHILLIPS: Objection as to relevance.	11:10:31
4	A No, I don't believe so.	11:10:36
5	Q Have you ever met with a notary from --	11:10:41
6	and I don't want privileged communications, but	11:10:44
7	have you ever met with a notary from Morella &	11:10:46
8	Associates?	11:10:50
9	A I don't -- I don't remember if I have or	11:10:51
10	not. Possibly in signing some stuff, but I don't	11:10:57
11	recall. A lot of stuff was DocuSign.	11:11:02
12	Q Have -- do you recall ever meeting in	11:11:07
13	person with a notary from Morella & Associates,	11:11:11
14	LLC -- Morella & Associates?	11:11:17
15	A I don't remember if I have or not.	11:11:20
16	Q Did Spencer play any sports in high	11:11:23
17	school?	11:11:28
18	MR. PHILLIPS: Objection. Relevance.	11:11:28
19	A I don't think so.	11:11:36
20	Q Does he play any sports now?	11:11:38
21	MR. PHILLIPS: Objection. Relevance.	11:11:39
22	A No.	
23	Q Did you testify or not -- did you speak	11:11:42
24	approximately ten minutes ago to your attorney	11:11:45
25	right after we went off the record in an answer to	11:11:47

Transcript of Jason Svonavec  
Conducted on November 5, 2024

58

1	his question of whether or not Spencer was a ball	11:11:51
2	player and he is a ball player?	11:11:53
3	MR. PHILLIPS: Objection. Asking for	11:11:55
4	attorney-client privilege.	11:11:57
5	MR. TOWNSEND: Dean, you had that	11:11:59
6	conversation right in front of me.	11:12:02
7	MR. ZATKO: It was my son Spencer.	11:12:03
8	MR. PHILLIPS: Just for the record, I'm	11:12:03
9	referring to Matt Zatko's son Spencer.	11:12:05
10	MR. TOWNSEND: That's what I'm just trying	
11	to ask.	11:12:06
12	MR. ZATKO: That's my son.	11:12:06
13	BY MR. TOWNSEND:	11:12:09
14	Q So did that or did that not happen?	11:12:09
15	A I didn't even hear you talk about --	11:12:12
16	MR. PHILLIPS: That was a conversation	11:12:14
17	between Matt Zatko and Dean Phillips. Jason was	11:12:15
18	not a part of that conversation.	11:12:19
19	MR. TOWNSEND: Understood, Dean. I	11:12:20
20	appreciate that. I was trying to get it from our	11:12:21
21	witness.	11:12:22
22	Q You didn't have that conversation with	11:12:22
23	Dean approximately 15 minutes ago?	11:12:23
24	A No.	11:12:25
25	MR. TOWNSEND: Okay. That is all the	11:12:28

Transcript of Jason Svonavec  
Conducted on November 5, 2024

59

1 questions I have of you, Mr. Svonavec. We reserve  
2 a right to call you back to the extent any of our  
3 questions -- my questions weren't answered or your  
4 attorney instructed you improperly not to answer a  
5 question based on various privileges. And we can  
6 revisit that later.

11:12:29

11:12:32

11:12:38

11:12:41

11:12:45

11:12:48

7 Otherwise, I have no further questions and  
8 I pass the witness.

11:12:50

11:12:53

9 EXAMINATION

09:36:44

10 BY MR. PHILLIPS:

09:36:44

11 Q Jason, I just want to revisit with you  
12 briefly. I won't keep us much longer here, but  
13 briefly, in regards to the transfer of Banshee  
14 Industries from Jason's Interest, LLC to Angela  
15 Svonavec, and if I can, I'll find the exhibit here  
16 if you don't mind me pulling through this real  
17 quick. I'm showing you Exhibit 6 here.

11:13:00

11:13:02

11:13:04

11:13:09

11:13:12

11:13:16

11:13:19

18 A Okay.

11:13:25

19 Q When this transfer -- or, yeah, this  
20 agreement was signed, at the time it was before it  
21 was signed, Jason's Interest, LLC owned Banshee  
22 Industries; correct?

11:13:25

11:13:29

11:13:33

11:13:36

23 A Yes.

11:13:38

24 Q And this agreement transfers Jason's --  
25 excuse me, Banshee Industries from Jason's

11:13:38

11:13:41

Transcript of Jason Svonavec  
Conducted on November 5, 2024

60

1	Interest to Angela Svonavec; correct?	11:13:43
2	A Correct.	11:13:46
3	Q And so thereafter, after this agreement,	11:13:46
4	Jason's Interest, LLC no longer owned Banshee	11:13:54
5	Industries, LLC?	11:14:00
6	A That is correct.	11:14:00
7	Q And Angela Svonavec received the	11:14:01
8	membership interest in Banshee Industries, LLC?	11:14:02
9	A Yes.	11:14:05
10	MR. PHILLIPS: Okay. I don't think I have	11:14:13
11	anything further for you, Jason.	11:14:15
12	MR. TOWNSEND: Okay. This ends our	11:14:16
13	deposition. Thank you.	11:14:17
14	THE VIDEOGRAPHER: Okay. This will end	11:14:18
15	the deposition of Jason Svonavec. We are going	11:14:20
16	off the record. The time is 11:14.	11:14:23
17	THE REPORTER: Do you want a copy of the	11:15:22
18	transcript?	11:15:23
19	MR. PHILLIPS: Yes.	11:15:25
20	(At 11:14 a.m., the deposition was	
21	concluded.)	
22		
23		
24		
25		

Transcript of Jason Svonavec  
Conducted on November 5, 2024

61

1 CERTIFICATE OF SHORTHAND REPORTER- E-NOTARY  
2 PUBLIC.

3 I, MARIA M. SIATKOWSKI, Registered Diplomate  
4 Reporter, Certified Realtime Reporter, Certified  
5 Realtime Captioner and Notary Public, the officer  
6 before whom the foregoing deposition was taken, do  
7 hereby certify that the foregoing transcript is a  
8 true and correct record of the testimony given;  
9 that said testimony was taken by me  
10 stenographically and thereafter reduced to  
11 typewriting under my supervision; that reading and  
12 signing was not requested; and that I am neither  
13 counsel for or related to, nor employed by any of  
14 the parties to this case and have no interest,  
15 financial or otherwise, in its outcome.

16 IN WITNESS WHEREOF, I have hereunto set my hand  
17 and affixed my notarial seal this 7th day of  
18 November 2024.

19 My commission expires June 15, 2025.

20  
21 *Maria M. Siatkowski*  
22 \_\_\_\_\_

23 E-NOTARY PUBLIC IN AND FOR  
24 THE STATE OF PENNSYLVANIA  
25

Transcript of Jason Svonavec  
Conducted on November 5, 2024

62

A			
<b>able</b>	<b>after</b>	37:9, 37:12,	<b>another</b>
7:17	52:9, 57:25,	38:15, 41:22,	22:17
<b>about</b>	60:3	43:14, 45:12,	<b>answer</b>
12:23, 16:15,	<b>again</b>	46:11, 48:20,	7:13, 7:17,
23:2, 31:5,	10:2, 28:2,	49:9, 49:15,	8:25, 9:6, 9:18,
32:23, 34:1,	31:12, 49:14	50:10, 58:25	13:12, 14:6,
36:24, 41:25,	<b>ago</b>	<b>also</b>	15:18, 15:22,
44:19, 49:22,	12:2, 12:19,	4:1, 20:7,	18:20, 19:5,
51:16, 58:15	20:17, 36:24,	31:4, 37:23,	19:12, 19:15,
<b>accepts</b>	37:3, 44:18,	44:10, 51:25	21:1, 23:13,
33:3	49:22, 57:24,	<b>always</b>	30:24, 31:3,
<b>account</b>	58:23	21:4, 27:5,	31:8, 31:18,
56:12	<b>agree</b>	51:7, 56:2	35:20, 35:23,
<b>accountant</b>	34:4, 34:18,	<b>amongst</b>	36:2, 37:10,
18:1, 41:12,	41:4, 44:20,	16:13	38:1, 38:2,
55:6	45:1	<b>amount</b>	42:12, 42:14,
<b>accountants</b>	<b>agreement</b>	43:21, 44:6	42:20, 45:14,
19:1, 20:21,	5:14, 5:15,	<b>angela</b>	47:20, 47:22,
34:13, 39:7,	5:19, 25:13,	8:3, 8:8, 11:1,	48:12, 57:25,
39:9, 39:12,	26:5, 32:6,	12:17, 13:24,	59:4
39:15, 41:16,	34:14, 34:15,	14:2, 14:7,	<b>answered</b>
41:21, 42:2,	55:16, 59:20,	14:9, 21:25,	14:5, 20:3,
42:9, 42:14,	59:24, 60:3	22:3, 22:22,	28:15, 32:15,
42:16, 44:9,	<b>ahead</b>	25:17, 25:22,	34:21, 37:5,
44:12, 45:9	31:25	25:25, 26:4,	39:22, 42:8,
<b>accounting</b>	<b>ahold</b>	26:6, 26:7,	42:21, 59:3
17:15, 56:20	22:12	30:4, 30:6,	<b>any</b>
<b>accurate</b>	<b>aircraft</b>	30:9, 30:25,	7:16, 8:8,
42:18, 44:7	50:2, 50:6,	31:10, 32:7,	8:17, 10:22,
<b>acknowledged</b>	50:11, 50:20,	33:9, 34:24,	11:19, 11:20,
34:3	53:1, 53:3	36:3, 36:13,	15:15, 16:5,
<b>action</b>	<b>airline</b>	37:2, 37:15,	16:15, 17:17,
1:8, 1:17	50:15, 51:1,	37:20, 38:23,	21:20, 30:1,
<b>actually</b>	52:22	39:6, 40:17,	30:4, 31:17,
45:25, 52:7	<b>airport</b>	47:2, 47:15,	42:22, 44:3,
<b>address</b>	53:8, 53:11,	47:23, 47:24,	50:4, 53:18,
12:6, 22:20,	53:18, 53:23	48:2, 48:6,	53:22, 56:4,
24:5, 39:24,	<b>airports</b>	48:7, 50:2,	57:16, 57:20,
46:1, 46:2	53:14	50:20, 52:4,	59:2, 61:13
<b>adopted</b>	<b>all</b>	52:16, 53:1,	<b>anybody's</b>
24:9, 28:7	13:2, 15:2,	53:6, 53:14,	23:2
<b>adoption</b>	17:3, 18:1,	53:22, 55:14,	<b>anymore</b>
28:13	21:15, 22:5,	55:24, 59:14,	17:21
<b>affix</b>	22:6, 23:15,	60:1, 60:7	<b>anything</b>
19:25	23:22, 24:8,	<b>angela's</b>	31:10, 35:6,
<b>affixed</b>	31:21, 32:4,	54:5, 54:16	60:11
61:17	33:10, 35:25,	<b>angie</b>	<b>appreciate</b>
	36:9, 36:18,	51:24	9:14, 58:20



Transcript of Jason Svonavec  
Conducted on November 5, 2024

63

<b>approximate</b> 56:24 <b>approximately</b> 21:23, 57:24, 58:23 <b>april</b> 47:9, 47:12, 48:3 <b>argumentative</b> 30:13, 36:16, 42:20, 44:8 <b>around</b> 21:24, 40:5, 52:13 <b>aside</b> 25:2 <b>asked</b> 14:4, 15:13, 19:11, 20:2, 28:14, 32:15, 34:20, 37:4, 39:21, 42:8, 42:21, 48:20 <b>asking</b> 15:3, 16:4, 31:5, 31:13, 31:15, 42:10, 48:8, 58:3 <b>assign</b> 18:14 <b>assigned</b> 55:13 <b>assignee</b> 33:2 <b>assignment</b> 5:13, 5:18, 32:5 <b>assignor</b> 32:25, 33:4 <b>assigns</b> 32:25 <b>associated</b> 43:25, 45:6 <b>associates</b> 3:5, 6:21, 29:6, 57:8, 57:13, 57:14 <b>attached</b> 5:8, 8:1,	16:25, 23:7, 25:4, 29:4, 38:7, 43:6, 46:14, 49:19 <b>attend</b> 10:22, 11:16 <b>attended</b> 11:12 <b>attending</b> 11:7 <b>attorney</b> 34:12, 57:24, 59:4 <b>attorney-client</b> 14:19, 15:23, 16:3, 18:24, 23:11, 30:23, 58:4 <b>attorneys</b> 19:1, 33:11, 34:13, 36:10, 36:17, 55:6, 56:10 <b>audit</b> 26:8 <b>august</b> 24:9, 25:18, 25:22, 26:1, 26:22, 28:7, 28:9 <b>authentic</b> 49:13 <b>authenticated</b> 48:17, 49:2 <b>authenticity</b> 48:24, 49:10 <b>avenue</b> 3:23 <b>aware</b> 11:18, 52:24	54:24, 59:2 <b>bad</b> 54:3 <b>ball</b> 58:1, 58:2 <b>bank</b> 46:25, 56:12 <b>banshee</b> 1:13, 3:3, 3:11, 6:5, 10:9, 17:24, 18:15, 20:10, 21:10, 21:13, 21:20, 21:25, 22:4, 22:13, 22:20, 22:23, 29:23, 30:9, 30:21, 31:11, 33:8, 37:8, 54:13, 55:14, 55:24, 59:13, 59:21, 59:25, 60:4, 60:8 <b>based</b> 35:20, 42:10, 59:5 <b>bates</b> 17:5, 23:16, 24:22, 25:6, 31:22, 38:9, 43:8, 43:20, 46:16 <b>beagle</b> 22:21, 47:3 <b>beam</b> 8:22 <b>because</b> 16:11, 27:4, 36:10, 42:12, 42:16, 45:14, 52:8 <b>been</b> 7:5, 8:3, 24:25, 26:13, 29:13, 32:15, 42:8, 42:21, 43:4, 46:7, 46:10, 48:17,	51:6, 52:7, 52:14, 53:3 <b>before</b> 2:13, 13:3, 17:11, 21:5, 23:23, 28:17, 31:24, 33:13, 41:14, 43:17, 46:21, 59:20, 61:6 <b>beginning</b> 23:17, 52:13 <b>begins</b> 6:2 <b>behalf</b> 3:2, 3:10, 3:18 <b>being</b> 19:14 <b>believe</b> 17:24, 20:17, 20:25, 37:18, 55:19, 57:4 <b>below</b> 19:21, 24:15, 33:18 <b>besides</b> 50:5, 53:23 <b>between</b> 18:3, 28:12, 31:6, 31:14, 32:6, 35:17, 58:17 <b>bit</b> 10:5, 27:8 <b>books</b> 56:7, 56:15, 56:19 <b>borderline</b> 42:22 <b>born</b> 8:23 <b>both</b> 6:19, 6:21, 6:23, 45:22, 46:5 <b>bottom</b> 24:21 <b>bound</b> 34:4
	<b>B</b>		
	<b>back</b> 18:13, 26:21, 27:14, 33:25, 48:1, 49:12, 51:6, 51:7, 51:9, 52:10,		

Transcript of Jason Svonavec  
Conducted on November 5, 2024

64

<b>box</b> 38:25 <b>briefly</b> 59:12, 59:13 <b>bureau</b> 5:11 <b>businesses</b> 17:17 <hr/> <p style="text-align: center;"><b>C</b></p> <hr/> <b>california</b> 13:17 <b>call</b> 27:11, 59:2 <b>called</b> 7:4 <b>calling</b> 35:15 <b>calls</b> 27:23, 28:3, 28:19, 31:1, 34:10, 34:25, 35:1, 37:23, 41:19, 47:16, 48:5, 53:19, 54:1 <b>came</b> 51:8 <b>can't</b> 27:5, 35:19, 37:11, 54:3 <b>capital</b> 46:24 <b>captioner</b> 2:15, 61:5 <b>car</b> 54:6, 54:8, 54:17 <b>cards</b> 11:20 <b>care</b> 22:5, 33:11 <b>case</b> 6:8, 12:21, 15:1, 29:18, 30:2, 30:5, 42:2, 61:14 <b>cause</b> 33:7	<b>center</b> 3:22 <b>certificate</b> 61:1 <b>certified</b> 2:14, 2:15, 61:4 <b>certify</b> 61:7 <b>changing</b> 35:12 <b>children</b> 8:8 <b>choice</b> 16:11 <b>choose</b> 20:22 <b>civil</b> 1:8, 1:17 <b>clarendon</b> 51:20 <b>clarification</b> 37:13 <b>clarify</b> 11:10, 15:15 <b>clean</b> 15:4 <b>clear</b> 15:4, 19:14 <b>clients</b> 49:13 <b>coal</b> 1:19, 3:19, 6:5, 9:7, 9:8, 9:11, 9:22, 10:14, 20:11, 20:15, 20:18, 20:22, 20:23, 21:5, 21:6, 21:8, 21:17, 29:23 <b>collect</b> 22:13, 22:23 <b>collecting</b> 23:2 <b>column</b> 40:20 <b>com</b> 27:19	<b>come</b> 51:7 <b>comes</b> 14:11 <b>commercial</b> 50:15, 51:1, 52:22 <b>commission</b> 61:19 <b>commonwealth</b> 2:16 <b>communication</b> 35:4, 35:17 <b>communications</b> 31:14, 31:16, 48:11, 57:6 <b>company</b> 1:7, 1:16, 9:8, 20:11, 21:19, 33:2, 33:3, 54:11, 54:12 <b>computer</b> 11:11, 27:6, 28:1 <b>concluded</b> 60:21 <b>conclusion</b> 31:2, 34:11, 35:1, 35:9, 35:16, 35:21, 37:23 <b>conduct</b> 27:12 <b>consecutive</b> 38:13 <b>consider</b> 13:16, 13:19, 13:21 <b>consideration</b> 34:2, 34:9, 34:23, 35:3, 35:8, 35:9, 36:2, 36:6 <b>consult</b> 49:12 <b>contents</b> 16:5, 39:11, 43:17	<b>contract</b> 34:18, 35:10, 36:3, 36:6, 36:12, 36:17, 36:21 <b>conversation</b> 16:13, 58:6, 58:16, 58:18, 58:22 <b>conversations</b> 16:5, 16:9, 31:6 <b>conveys</b> 33:1 <b>copy</b> 23:5, 60:17 <b>corner</b> 24:21, 39:1 <b>correct</b> 18:16, 20:13, 24:13, 32:20, 33:13, 34:19, 34:22, 37:16, 42:15, 56:1, 59:22, 60:1, 60:2, 60:6, 61:8 <b>could</b> 19:6, 26:11, 36:1, 40:11 <b>couldn't</b> 27:25 <b>counsel</b> 6:16, 14:25, 16:6, 16:9, 16:14, 16:21, 17:15, 28:23, 28:24, 61:13 <b>county</b> 10:12, 46:3 <b>couple</b> 31:6, 31:14 <b>court</b> 1:1, 6:7, 6:24 <b>crc</b> 1:35 <b>create</b> 20:18, 23:8 <b>created</b> 21:5
---	---	--	---

Transcript of Jason Svonavec  
Conducted on November 5, 2024

65

<b>criminal</b> 12:21, 15:1 <b>crr</b> 1:35 <b>cyber</b> 10:19, 11:3, 11:7, 11:12, 11:16 <hr/> <p style="text-align: center;"><b>D</b></p> <hr/> <b>date</b> 6:10, 18:11, 24:8, 24:12, 28:13, 30:15, 32:19, 36:22, 47:8 <b>day</b> 26:24, 32:9, 61:17 <b>dean</b> 3:4, 6:20, 9:14, 16:4, 19:5, 31:8, 35:3, 47:19, 48:19, 58:5, 58:17, 58:19, 58:23 <b>decision</b> 16:19 <b>decision-making</b> 16:15 <b>declaration</b> 29:17, 29:22 <b>defendant</b> 1:11, 1:22 <b>defendants</b> 3:18, 6:19, 7:4 <b>depos</b> 6:13, 7:1 <b>deposition</b> 1:25, 2:1, 6:3, 6:14, 7:11, 48:25, 49:2, 60:13, 60:15, 60:20, 61:6 <b>different</b> 40:20, 40:21 <b>diplomate</b> 2:14, 61:3	<b>direction</b> 50:19 <b>disagree</b> 35:5 <b>discuss</b> 39:8, 39:11 <b>district</b> 1:1, 1:2, 6:7 <b>doc</b> 24:22 <b>document</b> 5:17, 12:24, 13:1, 13:3, 13:5, 13:7, 13:11, 13:13, 17:4, 17:9, 17:11, 18:11, 18:14, 18:18, 19:20, 20:1, 23:16, 23:19, 23:21, 23:23, 24:2, 24:18, 25:10, 25:16, 27:20, 28:6, 28:22, 30:1, 31:21, 31:24, 32:2, 32:18, 32:19, 32:21, 33:7, 33:12, 33:17, 33:22, 38:9, 38:18, 40:15, 43:11, 46:19, 46:21, 48:18, 48:20, 48:24, 49:10, 49:13 <b>documents</b> 30:4, 56:4 <b>docusign</b> 24:24, 27:3, 27:6, 57:11 <b>doing</b> 15:8 <b>dollars</b> 44:24, 45:1 <b>done</b> 12:25, 17:8, 21:4, 23:20, 25:8, 32:1, 38:17, 43:12, 46:18, 56:20 <b>down</b> 24:20, 25:16, 26:16, 40:23, 42:22, 51:4, 51:8, 51:13, 51:18, 52:10, 53:3 <b>dozen</b> 21:24 <b>drive</b> 12:8, 50:12, 50:23, 51:20, 52:17, 52:19, 54:6 <b>dropbox</b> 5:17, 26:8 <b>duly</b> 7:5 <b>dwell</b> 12:21 <b>dylan</b> 4:2, 6:12 <hr/> <p style="text-align: center;"><b>E</b></p> <hr/> <b>e-mail</b> 27:9, 27:17, 27:18 <b>e-mails</b> 27:13 <b>e-notary</b> 61:1, 61:23 <b>east</b> 2:6, 3:14, 6:14 <b>eastern</b> 6:11 <b>effective</b> 32:9, 36:21 <b>either</b> 22:17 <b>else</b> 54:4 <b>employed</b> 61:13 <b>employee</b> 22:17	<b>employees</b> 21:21 <b>end</b> 60:14 <b>ends</b> 60:12 <b>ensure</b> 49:13, 49:15 <b>entered</b> 18:3, 34:14 <b>entire</b> 11:14 <b>equipment</b> 20:12, 21:18 <b>esquire</b> 3:4, 3:12, 3:20 <b>estate</b> 12:1 <b>even</b> 29:25, 58:15 <b>ever</b> 10:1, 10:14, 10:22, 11:16, 11:20, 12:14, 12:15, 13:16, 13:19, 23:2, 39:8, 40:6, 50:12, 50:15, 50:23, 51:1, 52:16, 52:19, 52:22, 55:10, 57:5, 57:7, 57:12 <b>every</b> 7:13, 26:17, 50:7, 51:15, 51:16 <b>everything</b> 21:19, 37:13, 37:18, 42:14 <b>exact</b> 37:10 <b>exactly</b> 12:5 <b>examination</b> 5:2, 7:7, 59:9 <b>exchange</b> 31:10
---	--	---

Transcript of Jason Svonavec  
Conducted on November 5, 2024

66

<b>exclusively</b> 50:19 <b>excuse</b> 59:25 <b>exhibit</b> 5:9, 5:10, 5:11, 5:13, 5:15, 5:17, 5:18, 5:20, 5:21, 5:22, 7:24, 7:25, 16:23, 16:24, 17:2, 23:5, 23:6, 25:2, 25:3, 29:2, 29:3, 38:5, 38:6, 43:4, 43:5, 46:12, 46:13, 48:15, 48:17, 49:18, 59:15, 59:17 <b>exhibits</b> 5:7 <b>exist</b> 16:8 <b>existing</b> 55:4 <b>expires</b> 61:19 <b>extent</b> 16:11, 59:2	<b>federal</b> 42:4 <b>few</b> 7:10, 12:23, 40:20 <b>file</b> 39:5, 42:4 <b>filed</b> 38:22, 39:2, 40:16, 41:6, 41:9, 41:14, 43:18, 45:5 <b>filing</b> 41:3, 41:7, 41:18, 42:5, 42:6, 42:25, 43:1 <b>finally</b> 25:25 <b>finance</b> 22:6 <b>finances</b> 48:7 <b>financial</b> 22:6, 61:15 <b>find</b> 59:15 <b>fine</b> 15:17 <b>firm</b> 17:15, 56:20 <b>first</b> 7:5, 11:25, 17:4, 18:2, 32:4, 38:20, 43:9, 51:3, 51:5 <b>five</b> 44:17 <b>flew</b> 49:25, 51:4, 51:5, 51:9 <b>flip</b> 19:19, 40:11 <b>flipping</b> 33:25 <b>florida</b> 11:13, 12:1, 12:11, 13:19,	13:22, 13:25, 14:9, 14:10, 14:13, 26:14, 26:16, 28:18, 45:22, 45:23, 45:24, 45:25, 46:4, 46:8, 46:9, 49:21, 49:24, 50:5, 50:12, 50:21, 50:24, 51:4, 51:6, 51:9, 51:13, 51:19, 52:1, 52:17, 52:20, 53:18 <b>fly</b> 50:7, 53:9, 53:12 <b>follow</b> 34:18 <b>follows</b> 7:6, 34:5 <b>foregoing</b> 61:6, 61:7 <b>forget</b> 52:11 <b>form</b> 11:8, 13:10, 18:17, 20:24, 43:22, 49:15, 55:17 <b>forward</b> 15:7, 15:10 <b>four</b> 12:19, 36:24, 37:2 <b>fpc</b> 13:8, 13:14, 16:1, 16:20 <b>friend</b> 50:8 <b>friend's</b> 53:2, 53:6 <b>front</b> 58:6 <b>further</b> 42:22, 59:7, 60:11	<b>G</b> <b>gabby</b> 28:25 <b>gas</b> 54:17 <b>gates</b> 3:21, 3:22, 6:19 <b>gave</b> 7:13, 31:17, 36:3 <b>gift</b> 30:25 <b>give</b> 12:3, 31:10, 34:24, 36:5, 37:20, 42:2 <b>given</b> 14:25, 49:9, 61:8 <b>giving</b> 31:11, 36:13, 38:8 <b>gmail</b> 27:15 <b>go</b> 10:18, 14:11, 26:21, 31:25, 49:12, 49:23, 50:20, 51:14, 51:15, 51:18, 54:4, 54:19 <b>going</b> 9:13, 10:2, 12:21, 12:22, 15:3, 15:7, 15:8, 16:22, 23:4, 23:15, 34:24, 42:21, 45:9, 45:14, 50:18, 52:23, 54:21, 60:15 <b>gonna</b> 12:2, 42:12 <b>good</b> 7:9, 34:1, 34:8, 35:11,
<b>F</b> <b>fact</b> 16:8 <b>fall</b> 35:7 <b>familiar</b> 46:24 <b>far</b> 11:15, 50:22 <b>farm</b> 10:7, 10:8 <b>farms</b> 10:9 <b>father</b> 9:25 <b>fearless</b> 17:24, 37:8			

Transcript of Jason Svonavec  
Conducted on November 5, 2024

67

41:23 <b>graduate</b> 11:3 <b>great</b> 41:24 <b>guess</b> 9:23, 28:21	21:6, 29:23 <b>high</b> 10:5, 10:6, 10:14, 10:15, 10:17, 10:18, 57:16 <b>hire</b> 45:13 <b>history</b> 25:17 <b>hold</b> 55:3 <b>holding</b> 1:4, 3:2, 3:10, 6:4 <b>home</b> 16:1, 43:21, 43:25, 44:1, 44:16, 45:5, 48:7 <b>homeowners</b> 48:21 <b>homes</b> 45:15, 45:21, 45:22, 45:25 <b>honestly</b> 37:10 <b>house</b> 14:8, 14:12, 20:11, 20:15, 20:18, 20:22, 20:23, 21:5, 21:6, 21:8, 51:19, 51:22, 52:1 <b>housed</b> 13:8 <b>hurricane</b> 52:9, 52:11, 52:12 <b>husband</b> 35:18, 48:10	26:13 <b>identification</b> 7:25, 16:24, 23:6, 25:3, 29:3, 38:6, 43:5, 46:13, 49:18 <b>identify</b> 6:16 <b>impedes</b> 30:23 <b>impeding</b> 23:10 <b>improperly</b> 59:4 <b>income</b> 38:22, 40:16, 41:6 <b>industries</b> 1:13, 3:3, 3:11, 6:5, 17:24, 18:15, 20:10, 21:10, 21:13, 21:20, 21:25, 22:14, 22:20, 22:23, 29:23, 30:9, 30:21, 31:11, 33:9, 37:8, 55:14, 55:24, 59:14, 59:22, 59:25, 60:5, 60:8 <b>info</b> 36:9 <b>information</b> 19:2, 35:2, 41:17, 44:12, 44:15, 47:17, 48:9, 56:21 <b>instruct</b> 35:20 <b>instructed</b> 35:22, 59:4 <b>instructing</b> 15:20, 15:21, 19:4, 19:15, 23:12, 30:24,	31:7, 37:25, 47:19 <b>instructions</b> 41:2 <b>intending</b> 34:4 <b>interest</b> 5:13, 5:16, 5:18, 5:22, 17:14, 18:4, 18:8, 18:11, 18:15, 18:16, 20:8, 23:9, 24:13, 30:20, 32:5, 32:6, 32:13, 33:1, 33:3, 33:8, 33:18, 36:4, 36:5, 36:7, 36:8, 36:13, 36:18, 37:2, 37:6, 37:14, 37:19, 37:21, 43:22, 44:1, 44:16, 44:19, 44:20, 45:5, 47:5, 48:21, 55:3, 55:7, 55:10, 55:13, 55:15, 55:23, 56:4, 56:6, 56:11, 56:16, 56:19, 59:14, 59:21, 60:1, 60:4, 60:8, 61:14 <b>interests</b> 20:8, 30:8, 30:9 <b>invade</b> 15:22, 35:17 <b>invades</b> 37:24 <b>invading</b> 14:19 <b>involved</b> 11:19 <b>irs</b> 45:5
<b>H</b>			
<b>hand</b> 61:16 <b>handed</b> 38:16 <b>hanging</b> 12:20, 17:3, 23:16, 25:5, 31:21, 43:8, 46:15 <b>happen</b> 58:14 <b>harassment</b> 42:23 <b>head</b> 20:14, 36:11, 36:20 <b>hear</b> 15:15, 58:15 <b>held</b> 2:1, 55:8, 55:10 <b>here</b> 6:2, 7:11, 24:4, 28:9, 32:16, 39:24, 42:15, 43:20, 49:24, 52:8, 59:12, 59:15, 59:17 <b>hereby</b> 32:25, 33:2, 34:3, 61:7 <b>hereunto</b> 61:16 <b>heritage</b> 1:4, 1:19, 3:2, 3:10, 3:18, 6:4, 6:5, 20:15, 20:18, 20:23,			
	<b>I</b>		
	<b>id</b> 24:22 <b>idea</b> 11:18, 23:8,		

Transcript of Jason Svonavec  
Conducted on November 5, 2024

68

<b>issue</b> 31:13, 35:8 <b>issuing</b> 42:1 <b>iteration</b> 35:7 <b>itself</b> 13:11, 18:19 <hr/> <p style="text-align: center;"><b>J</b></p> <hr/> <b>january</b> 51:6, 51:7, 51:10 <b>jason</b> 1:25, 2:1, 5:2, 6:3, 7:3, 18:3, 18:6, 18:20, 18:25, 20:8, 24:5, 30:24, 37:25, 38:2, 47:22, 48:13, 48:17, 58:17, 59:11, 60:11, 60:15 <b>jason's</b> 5:15, 17:14, 18:4, 18:8, 18:10, 18:16, 20:8, 23:8, 24:13, 25:13, 26:4, 32:6, 32:12, 33:8, 33:18, 36:4, 36:5, 36:7, 36:8, 36:13, 36:18, 37:1, 37:6, 37:14, 37:19, 37:20, 55:3, 55:7, 55:10, 55:13, 55:15, 55:19, 55:22, 56:4, 56:6, 56:11, 56:16, 56:19, 59:14, 59:21, 59:24, 59:25, 60:4 <b>jason@fearlessle-</b> <b>asing</b> 27:19	<b>job</b> 1:33 <b>joint</b> 42:5 <b>jointly</b> 39:2, 39:5, 42:25 <b>june</b> 32:9, 32:13, 36:22, 61:19 <hr/> <p style="text-align: center;"><b>K</b></p> <hr/> <b>k&amp;l</b> 3:21, 3:22, 6:18 <b>keep</b> 51:22, 56:6, 59:12 <b>keeps</b> 56:9 <b>keisler</b> 6:13 <b>kiesler</b> 4:2 <b>know</b> 9:1, 10:15, 10:21, 11:2, 11:15, 12:5, 12:24, 13:6, 13:23, 17:7, 18:21, 22:9, 22:19, 23:1, 23:20, 25:8, 27:14, 27:17, 27:24, 28:4, 29:12, 29:19, 29:21, 29:25, 32:1, 34:12, 37:7, 37:11, 37:12, 38:17, 41:11, 41:13, 42:13, 42:16, 42:17, 43:1, 43:2, 43:12, 44:2, 44:17, 45:3, 45:4, 45:12, 45:14, 45:18, 45:22,	46:1, 46:18, 47:25, 48:2, 48:6, 50:9, 52:15, 53:17, 53:21, 53:22, 54:10, 54:17, 54:18, 57:2 <b>knowing</b> 36:12 <b>known</b> 36:20 <b>ktrv</b> 1:10, 3:18, 6:4 <hr/> <p style="text-align: center;"><b>L</b></p> <hr/> <b>label</b> 17:5, 23:16, 24:22, 25:6, 31:22, 38:9, 43:8, 43:21 <b>labeled</b> 46:16 <b>lane</b> 39:24, 45:6 <b>language</b> 34:6 <b>laptop</b> 26:10, 26:11, 26:15, 26:19, 26:23 <b>last</b> 8:15, 24:1, 24:15, 24:21, 29:9, 29:13, 30:16, 49:20, 52:4, 55:2, 55:7, 56:18 <b>later</b> 59:6 <b>laura</b> 57:2 <b>law</b> 2:5, 3:13, 6:22 <b>lay</b> 14:24, 15:13 <b>learn</b> 9:11, 9:21 <b>leasing</b> 17:25, 37:9	<b>least</b> 51:15, 51:16, 53:17 <b>leave</b> 8:2, 17:25 <b>left</b> 28:17 <b>left-hand</b> 39:1 <b>legal</b> 16:14, 18:1, 20:20, 31:2, 34:11, 35:1, 35:9, 35:15, 35:21, 37:23 <b>legally</b> 34:4 <b>less</b> 51:14 <b>letters</b> 40:20, 40:21 <b>liability</b> 1:6, 1:15 <b>license</b> 54:14 <b>limited</b> 1:6, 1:15 <b>line</b> 10:3, 25:21, 33:23 <b>list</b> 45:20 <b>listed</b> 43:8 <b>little</b> 10:5, 27:8, 27:11, 27:13, 50:1 <b>live</b> 40:2 <b>lived</b> 40:4 <b>living</b> 9:4, 14:2 <b>llc</b> 1:5, 1:10, 1:14, 1:21, 3:3, 3:11, 3:18,
--	--	--	---

Transcript of Jason Svonavec  
Conducted on November 5, 2024

69

5:16, 6:4, 6:5, 6:6, 17:14, 18:4, 18:8, 18:11, 18:15, 18:16, 18:23, 20:8, 20:10, 20:15, 20:19, 20:23, 21:6, 21:11, 21:14, 21:20, 22:1, 22:14, 22:20, 22:23, 23:9, 24:13, 29:23, 29:24, 30:9, 30:21, 31:11, 32:6, 32:13, 33:8, 33:9, 33:18, 36:13, 37:2, 37:21, 55:3, 55:4, 55:8, 55:10, 55:13, 55:14, 55:15, 55:23, 55:24, 56:4, 56:6, 56:11, 56:16, 56:19, 57:14, 59:14, 59:21, 60:4, 60:5, 60:8 <b>llp</b> 3:21 <b>loan</b> 5:22, 44:23, 47:5 <b>located</b> 12:10, 15:25, 29:6, 46:3 <b>location</b> 5:12, 14:15 <b>log</b> 11:11, 11:16 <b>long</b> 8:3, 12:22, 40:4 <b>longer</b> 59:12, 60:4 <b>look</b> 26:21, 28:6,	41:2 <b>looking</b> 16:7, 43:4 <b>looks</b> 36:4, 38:21 <b>lord</b> 50:7 <b>lost</b> 45:12 <b>lot</b> 44:19, 57:11 <hr/> <b>M</b> <hr/> <b>mail</b> 22:13, 22:23, 23:3 <b>mailing</b> 22:20 <b>maintenance</b> 53:4 <b>make</b> 14:23, 21:8 <b>making</b> 15:9 <b>many</b> 8:11, 8:19, 21:23, 45:15, 52:15 <b>maria</b> 1:35, 2:13, 6:25, 61:3 <b>mark</b> 16:22, 23:4, 25:1, 29:1, 38:4, 41:17, 43:3, 48:14 <b>marked</b> 7:24, 7:25, 16:24, 17:4, 23:6, 25:3, 25:6, 29:3, 31:22, 32:24, 38:6, 39:1, 40:24, 42:24, 43:1, 43:5, 46:13, 49:18 <b>marking</b> 38:8, 46:12	<b>married</b> 8:3, 8:6, 14:3, 31:6, 31:14, 39:2, 41:3, 41:7, 41:18, 42:5, 42:6, 42:25, 43:1 <b>matt</b> 6:22, 15:5, 58:9, 58:17 <b>matter</b> 6:4, 16:14, 19:2, 29:22 <b>matthew</b> 2:5, 3:12, 3:13 <b>maybe</b> 10:7 <b>mean</b> 11:9, 12:17, 22:8, 38:21, 41:9, 48:19, 52:2 <b>means</b> 7:13, 41:3, 50:5, 52:25 <b>media</b> 6:2 <b>meet</b> 55:22, 55:25 <b>meeting</b> 55:8, 55:11, 57:12 <b>meetings</b> 10:23 <b>member</b> 24:5, 24:13, 24:16, 55:21 <b>members</b> 55:8, 55:11, 55:15, 55:18 <b>membership</b> 5:13, 5:18, 18:15, 32:5, 33:1, 33:3, 60:8 <b>memorialize</b> 56:3 <b>memorize</b> 36:20	<b>met</b> 57:5, 57:7 <b>middle</b> 32:23, 34:1, 47:9 <b>might</b> 24:25, 26:13, 52:7 <b>million</b> 44:24 <b>mind</b> 59:16 <b>mine</b> 9:11, 9:22, 50:8 <b>mines</b> 9:7 <b>mining</b> 10:14 <b>minutes</b> 57:24, 58:23 <b>mischaracterizing</b> 42:20 <b>moment</b> 25:2 <b>money</b> 21:8 <b>monitor</b> 6:11 <b>month</b> 51:17 <b>months</b> 29:14, 36:24, 37:3 <b>more</b> 15:16, 51:14 <b>morella</b> 3:5, 6:20, 28:25, 29:5, 57:7, 57:13, 57:14 <b>morgantown</b> 13:8, 13:9, 13:14, 16:1, 16:20 <b>morning</b> 7:9 <b>mortgage</b> 40:6, 40:9,
--	--	--	---



Transcript of Jason Svonavec  
Conducted on November 5, 2024

70

43:21, 44:1, 44:3, 44:16, 45:5 <b>moving</b> 9:15, 9:17, 15:10 <b>much</b> 59:12 <b>mulch</b> 20:11, 21:18 <b>multiple</b> 55:18 <b>myself</b> 9:25, 55:25, 56:2	<b>normally</b> 27:4 <b>notarial</b> 61:17 <b>notary</b> 2:15, 57:5, 57:7, 57:13, 61:5 <b>note</b> 47:8, 47:12, 47:15, 48:3 <b>noted</b> 15:14 <b>nothing</b> 38:3 <b>notice</b> 2:13 <b>november</b> 1:27, 6:10, 61:18 <b>number</b> 17:5 <b>numbers</b> 6:8, 12:9	10:24, 11:4, 13:10, 14:4, 14:17, 14:24, 15:6, 15:11, 15:14, 16:2, 18:24, 20:2, 23:10, 27:16, 28:14, 28:19, 29:7, 29:11, 29:15, 31:1, 34:10, 34:20, 35:6, 35:13, 35:15, 35:16, 35:20, 37:4, 39:21, 41:19, 44:8, 44:21, 44:25, 45:2, 45:7, 45:17, 47:16, 48:8, 49:8, 53:19, 53:25, 54:9, 57:3, 57:18, 57:21, 58:3 <b>objections</b> 9:15, 14:23, 15:8, 15:10, 35:14, 35:23 <b>october</b> 52:8, 52:13 <b>office</b> 2:5, 3:13, 22:5, 22:7, 22:10, 22:22, 51:22, 51:23, 51:24, 51:25 <b>officer</b> 61:5 <b>offices</b> 2:2 <b>often</b> 26:16, 50:8, 56:15 <b>oh</b> 49:1, 50:7 <b>okay</b> 14:20, 14:24, 16:22, 17:10, 19:14, 19:17,	21:10, 24:15, 24:20, 25:1, 25:11, 25:12, 32:23, 37:17, 38:4, 40:19, 42:4, 43:3, 43:7, 45:20, 46:11, 46:15, 47:24, 51:8, 51:12, 51:22, 54:19, 58:25, 59:18, 60:10, 60:12, 60:14 <b>once</b> 50:7 <b>one</b> 8:12, 8:20, 14:21, 15:2, 27:17, 35:13, 37:7, 40:23, 42:24, 43:7, 46:12, 52:23, 53:23 <b>online</b> 10:19 <b>only</b> 14:21, 49:1, 52:25, 55:21 <b>operating</b> 5:15, 25:13, 26:5 <b>operations</b> 21:15, 21:16 <b>other</b> 26:18, 42:25, 46:1, 50:4, 50:18, 51:16, 52:23, 53:18, 53:23 <b>otherwise</b> 48:18, 59:7, 61:15 <b>out</b> 10:5, 10:15, 20:22, 30:18, 38:15, 40:6, 40:9, 45:20, 47:12, 47:15,
<b>N</b>			
<b>name</b> 7:9, 8:13, 8:15, 8:21, 10:20, 12:6, 20:15, 24:5, 56:14 <b>naples</b> 12:11, 46:4, 53:12, 53:13 <b>nathan</b> 3:20, 6:18, 7:10, 9:13 <b>natural</b> 1:20, 6:6, 29:24 <b>near</b> 14:16, 16:1 <b>need</b> 7:13, 9:16, 15:4, 15:15, 48:11, 52:3 <b>neighborhood</b> 52:14 <b>neither</b> 61:12 <b>next</b> 9:2, 25:21, 43:7, 51:13 <b>non-property</b> 35:5 <b>non-redacted</b> 38:19, 40:12	<b>O</b>		
	<b>oath</b> 7:12 <b>object</b> 10:2, 11:8, 14:18, 17:1, 18:17, 20:24, 22:24, 27:22, 28:2, 30:12, 30:22, 31:4, 31:12, 32:14, 34:25, 35:1, 36:15, 37:22, 37:24, 42:7, 42:19, 48:4, 48:16, 55:17 <b>objected</b> 19:8 <b>objecting</b> 48:23 <b>objection</b> 8:24, 9:5, 9:10, 9:12,		



Transcript of Jason Svonavec  
Conducted on November 5, 2024

71

48:3 <b>outcome</b> 61:15 <b>outside</b> 16:8 <b>over</b> 35:21, 44:23 <b>oversee</b> 21:15 <b>overseeing</b> 21:18 <b>oversees</b> 22:5, 22:7, 22:22 <b>own</b> 9:8, 12:12, 12:14, 12:15, 17:17, 17:20, 17:21, 18:8, 36:8, 45:15, 50:2, 53:1, 54:8, 56:6, 56:11 <b>owned</b> 18:23, 36:7, 36:19, 37:6, 37:14, 37:19, 50:20, 59:21, 60:4 <b>owner</b> 18:10, 22:4, 32:12, 32:19 <b>ownership</b> 30:8 <b>owns</b> 17:19, 54:10, 54:11	33:25, 38:20, 40:11, 40:13, 43:9, 43:20, 46:16 <b>pages</b> 1:34, 38:13, 38:14, 42:17 <b>paper</b> 7:21 <b>paragraph</b> 18:2, 24:4, 32:4, 32:24 <b>parent</b> 10:23 <b>part</b> 22:6, 58:18 <b>particular</b> 16:14 <b>parties</b> 34:4, 61:14 <b>pass</b> 59:8 <b>past</b> 17:21 <b>path</b> 42:22 <b>pay</b> 54:17 <b>pennsylvania</b> 1:2, 1:5, 1:14, 1:26, 2:17, 6:8, 11:17, 11:24, 14:10, 14:14, 28:1, 40:16, 41:6, 50:13, 50:21, 50:23, 51:9, 52:5, 52:17, 52:19, 53:9, 53:23, 54:5, 54:14, 54:16, 61:24 <b>percent</b> 17:25 <b>person</b> 57:13 <b>person's</b> 8:21 <b>personal</b> 16:19, 51:23	<b>phillips</b> 3:4, 5:4, 6:20, 8:24, 9:5, 9:10, 9:12, 10:2, 10:24, 11:4, 11:8, 13:10, 14:4, 14:18, 14:22, 15:5, 15:9, 15:21, 16:2, 16:10, 17:1, 17:6, 18:17, 18:24, 19:6, 19:10, 19:16, 20:2, 20:24, 21:2, 22:24, 23:10, 23:14, 23:18, 25:7, 27:16, 27:22, 28:2, 28:14, 28:19, 29:7, 29:11, 29:15, 30:12, 30:22, 31:1, 31:4, 31:9, 31:12, 31:23, 32:14, 34:10, 34:20, 34:25, 35:8, 35:14, 35:22, 36:15, 37:4, 37:22, 38:11, 39:21, 41:19, 42:3, 42:7, 42:19, 43:10, 44:8, 44:21, 44:25, 45:2, 45:7, 45:17, 46:17, 47:16, 47:21, 48:4, 48:8, 48:16, 48:22, 48:25, 49:4, 49:7, 49:17, 53:19, 53:25, 54:9, 55:17, 57:3, 57:18, 57:21, 58:3, 58:8, 58:16, 58:17, 59:10,	60:10, 60:19 <b>phone</b> 27:1, 27:3, 27:4, 27:7, 27:9, 27:11, 36:1 <b>pick</b> 9:24 <b>picked</b> 9:23 <b>piece</b> 7:21, 35:4 <b>pittsburgh</b> 3:7, 3:24, 29:8 <b>place</b> 6:14, 13:16, 13:19, 13:21, 30:14, 56:25 <b>plaintiff</b> 1:8, 1:17 <b>plaintiffs</b> 3:2, 3:10, 6:21, 6:23 <b>planet</b> 6:13, 6:25 <b>plate</b> 54:14 <b>play</b> 57:16, 57:20 <b>player</b> 58:2 <b>please</b> 6:16, 7:22, 17:7, 23:19, 38:16 <b>points</b> 43:22 <b>portion</b> 38:20, 40:13 <b>portside</b> 12:8, 46:1 <b>possible</b> 26:25 <b>possibly</b> 57:10 <b>preliminary</b> 9:17 <b>prepare</b> 44:13
<b>P</b>			
<b>pa</b> 2:7, 3:7, 3:15, 3:24, 6:15 <b>page</b> 5:2, 5:9, 17:4, 19:20, 24:15, 24:21, 24:22, 25:5, 31:22, 32:23, 33:17,			

Transcript of Jason Svonavec  
Conducted on November 5, 2024

72

<p><b>present</b> 4:1, 35:10</p> <p><b>presently</b> 40:2</p> <p><b>previously</b> 20:15, 28:5</p> <p><b>print</b> 38:15</p> <p><b>prior</b> 43:14</p> <p><b>prison</b> 14:15, 16:12, 16:16</p> <p><b>prisons</b> 5:11</p> <p><b>privilege</b> 14:19, 15:23, 16:3, 18:25, 23:11, 30:23, 31:5, 31:13, 35:2, 37:25, 47:18, 48:10, 58:4</p> <p><b>privileged</b> 16:17, 19:3, 35:6, 47:17, 48:9, 57:6</p> <p><b>privileges</b> 59:5</p> <p><b>probably</b> 9:25, 12:2, 26:9, 42:1, 43:19, 44:22, 52:7</p> <p><b>produce</b> 7:21</p> <p><b>produced</b> 48:19, 49:10, 49:16</p> <p><b>professionals</b> 45:13</p> <p><b>property</b> 12:7, 12:12, 18:22, 31:17, 35:4, 40:7</p> <p><b>protected</b> 15:17, 35:2</p> <p><b>provide</b> 44:15</p>	<p><b>provided</b> 44:11, 44:17, 56:21</p> <p><b>public</b> 2:16, 61:2, 61:5, 61:23</p> <p><b>pulling</b> 59:16</p> <p><b>purchase</b> 11:25</p> <p><b>purported</b> 30:8</p> <p><b>purporting</b> 33:7</p> <p><b>purports</b> 18:14</p> <p><b>pursuant</b> 2:13</p> <p><b>put</b> 25:2, 49:11</p> <hr/> <p style="text-align: center;"><b>Q</b></p> <hr/> <p><b>quarter</b> 44:24</p> <p><b>question</b> 7:13, 9:2, 9:19, 9:20, 9:21, 11:9, 13:11, 14:6, 15:3, 15:12, 16:11, 18:18, 19:5, 19:11, 20:20, 20:25, 22:10, 23:13, 30:6, 30:24, 35:12, 36:2, 37:10, 41:11, 45:8, 47:22, 48:12, 49:11, 56:5, 58:1, 59:5</p> <p><b>question's</b> 42:21</p> <p><b>questioning</b> 10:3</p> <p><b>questions</b> 7:10, 7:17, 9:15, 12:23, 15:22, 16:15,</p>	<p>31:5, 59:1, 59:3, 59:7</p> <p><b>quick</b> 59:17</p> <p><b>quickly</b> 9:16</p> <hr/> <p style="text-align: center;"><b>R</b></p> <hr/> <p><b>ratification</b> 56:3</p> <p><b>ratified</b> 55:23</p> <p><b>ratify</b> 55:16, 55:22</p> <p><b>rdr</b> 1:35</p> <p><b>read</b> 33:5, 33:15, 42:11</p> <p><b>reading</b> 61:11</p> <p><b>real</b> 12:1, 17:18, 59:16</p> <p><b>really</b> 21:3, 22:9, 52:2</p> <p><b>realtime</b> 2:14, 2:15, 61:4, 61:5</p> <p><b>reason</b> 7:16, 26:23</p> <p><b>recall</b> 10:25, 24:3, 26:14, 29:16, 29:17, 30:15, 30:18, 31:20, 32:18, 39:10, 39:13, 39:16, 39:19, 41:15, 44:5, 46:2, 46:22, 46:23, 47:1, 50:10, 51:3, 51:5, 51:12, 51:14, 52:6, 53:5, 53:6, 53:7, 54:2, 55:9,</p>	<p>55:12, 56:23, 56:24, 57:11, 57:12</p> <p><b>receipt</b> 34:2</p> <p><b>received</b> 60:7</p> <p><b>recess</b> 54:23</p> <p><b>recognize</b> 38:19, 40:12, 48:18</p> <p><b>recommended</b> 16:21</p> <p><b>record</b> 10:4, 15:4, 15:14, 49:8, 54:20, 54:22, 54:25, 57:25, 58:8, 60:16, 61:8</p> <p><b>recorded</b> 43:22</p> <p><b>records</b> 49:14, 56:7, 56:9, 56:16, 56:19</p> <p><b>redacted</b> 38:14</p> <p><b>reduced</b> 61:10</p> <p><b>referring</b> 58:9</p> <p><b>reflect</b> 44:23</p> <p><b>regarding</b> 43:15</p> <p><b>regards</b> 19:1, 59:13</p> <p><b>registered</b> 2:14, 61:3</p> <p><b>related</b> 61:13</p> <p><b>relation</b> 30:2</p> <p><b>relevance</b> 8:24, 9:5, 9:10, 9:12,</p>
---	--	--	--

Transcript of Jason Svonavec  
Conducted on November 5, 2024

73

10:4, 10:24, 11:4, 17:2, 22:25, 27:16, 29:7, 29:11, 29:15, 44:21, 45:17, 54:9, 57:3, 57:18, 57:21 <b>relied</b> 18:25 <b>remember</b> 8:6, 9:19, 10:16, 12:8, 24:25, 30:19, 31:19, 37:1, 47:12, 50:22, 52:12, 57:9, 57:15 <b>repairs</b> 20:12, 21:17 <b>repeat</b> 50:18 <b>rephrase</b> 16:10 <b>report</b> 11:20 <b>reported</b> 1:35 <b>reporter</b> 2:14, 2:15, 6:24, 60:17, 61:1, 61:4 <b>represent</b> 6:17, 38:12 <b>representing</b> 6:13, 6:19, 6:21, 6:23, 6:25 <b>request</b> 5:11, 13:14, 14:15, 14:21, 16:12, 16:20 <b>requested</b> 13:15, 16:1, 49:16, 61:12 <b>requesting</b> 13:8, 19:12 <b>reserve</b> 59:1	<b>reside</b> 13:24, 14:10, 14:12 <b>residency</b> 14:16 <b>resident</b> 11:22, 11:24, 14:10 <b>resides</b> 14:9 <b>residing</b> 14:7 <b>resources</b> 1:20, 6:6, 29:24 <b>respect</b> 15:11 <b>rest</b> 38:13 <b>restate</b> 19:6, 19:10, 53:25 <b>return</b> 5:20, 5:21, 38:21, 38:22, 39:5, 39:12, 39:14, 39:17, 40:16, 41:14, 42:4, 42:5, 42:24, 42:25, 43:15, 43:16, 43:17, 44:13, 49:23 <b>returned</b> 28:1 <b>returns</b> 41:7, 44:13 <b>review</b> 12:24, 17:7, 23:19, 25:8, 32:1, 38:16, 39:14, 41:13, 43:11, 43:16, 49:14 <b>reviewed</b> 39:20, 42:18 <b>reviewing</b> 17:8, 25:9,	43:12, 46:18 <b>reviews</b> 13:1, 17:9, 23:21, 25:10, 32:2, 38:18, 46:19 <b>revisit</b> 59:6, 59:11 <b>ridge</b> 39:24, 45:6, 45:21 <b>right</b> 13:2, 15:2, 17:3, 18:4, 20:16, 23:15, 23:22, 24:6, 24:8, 24:10, 28:7, 28:10, 28:13, 30:10, 31:21, 32:4, 32:7, 32:10, 33:5, 33:9, 34:14, 34:16, 35:25, 36:22, 40:5, 41:22, 42:6, 42:11, 43:14, 44:13, 47:3, 47:6, 49:9, 52:10, 57:25, 58:6, 59:2 <b>right-hand</b> 24:21, 40:19 <b>road</b> 3:6, 22:21, 47:3 <b>rochester</b> 3:6 <b>rockwood</b> 10:11, 22:21 <b>rule</b> 16:7 <b>run</b> 22:11 <hr/> <b>S</b> <hr/> <b>said</b> 12:4, 37:18,	44:18, 46:7, 61:9 <b>same</b> 14:8, 14:12, 53:14 <b>save</b> 38:14 <b>saw</b> 24:2, 28:5 <b>say</b> 12:2, 12:19, 17:20, 22:7, 26:7, 26:9 <b>says</b> 18:2, 18:21, 24:4, 24:14, 25:12, 25:21, 25:25, 28:8, 28:9, 32:5, 32:11, 32:16, 32:18, 32:21, 32:25, 33:6, 33:25, 38:25, 40:19, 41:3, 41:5, 41:8, 47:4, 47:7 <b>school</b> 10:5, 10:6, 10:14, 10:15, 10:17, 10:18, 10:19, 10:20, 10:23, 11:3, 11:7, 11:12, 11:17, 57:17 <b>schooling</b> 11:19 <b>seal</b> 61:17 <b>second</b> 19:19, 33:17, 43:20 <b>section</b> 25:16 <b>see</b> 11:20, 13:5, 14:11, 19:20, 24:20, 25:12, 25:13, 25:19,
---	---	---	--

Transcript of Jason Svonavec  
Conducted on November 5, 2024

74

25:23, 26:2, 26:21, 27:5, 32:24, 33:20, 34:6, 38:25, 39:3, 39:25, 40:21, 40:24, 40:25, 43:23, 47:8, 47:10 <b>seeks</b> 35:17 <b>seems</b> 33:10 <b>seen</b> 13:3, 17:11, 23:23, 31:24, 33:12, 46:21 <b>sell</b> 12:18, 20:22, 21:8 <b>selling</b> 21:17 <b>sells</b> 20:11 <b>send</b> 26:10 <b>sent</b> 25:17, 28:22, 47:2 <b>sentence</b> 16:13, 16:16 <b>separate</b> 42:6 <b>separately</b> 41:3, 41:7, 41:18, 42:6, 43:1 <b>serve</b> 16:12 <b>serving</b> 16:16 <b>set</b> 17:16, 61:16 <b>several</b> 20:17 <b>shorthand</b> 61:1 <b>show</b> 13:7	<b>showing</b> 59:17 <b>shows</b> 13:13 <b>siatkowski</b> 1:35, 2:13, 6:25, 61:3 <b>sign</b> 5:17, 7:21, 20:4, 20:7, 24:18, 26:4, 26:6, 26:8, 26:11, 27:5, 29:22, 30:4, 33:22, 39:17 <b>signature</b> 5:10, 7:22, 19:21, 19:23, 19:25, 24:16, 25:17, 33:18, 33:23 <b>signature-mig2k</b> 61:20 <b>signed</b> 24:24, 25:25, 26:7, 27:20, 28:9, 28:17, 30:1, 34:16, 34:19, 36:12, 36:17, 39:19, 59:20, 59:21 <b>signing</b> 28:13, 29:17, 57:10, 61:12 <b>signor</b> 19:21 <b>since</b> 40:5 <b>sit</b> 11:6, 11:9 <b>sixth</b> 3:23 <b>skip</b> 51:17 <b>sold</b> 21:5 <b>sole</b> 18:10, 24:12,	32:12 <b>some</b> 9:17, 37:11, 53:4, 57:10 <b>somebody</b> 22:10 <b>somerset</b> 1:26, 2:7, 3:15, 6:15, 10:12, 53:10, 53:24, 54:3 <b>something</b> 12:20, 17:21, 21:4, 22:11, 45:14, 53:4 <b>sometimes</b> 26:17 <b>somewhere</b> 26:9, 52:14, 54:4 <b>son</b> 58:7, 58:9, 58:12 <b>sorry</b> 14:18, 14:22, 31:25, 49:5 <b>sort</b> 10:22, 21:16 <b>sounds</b> 41:22 <b>speak</b> 15:5, 48:11, 57:23 <b>speaking</b> 15:9 <b>speaks</b> 13:11, 18:18 <b>speculation</b> 27:23, 28:3, 28:20, 41:20, 48:5, 53:20, 54:1 <b>speed</b> 50:1 <b>spencer</b> 8:14, 8:23, 9:4, 9:21, 10:18, 11:6,	11:10, 11:11, 11:22, 57:16, 58:1, 58:7, 58:9 <b>sports</b> 57:16, 57:20 <b>spousal</b> 31:5, 31:13, 35:2, 35:12, 37:24, 47:17, 48:9 <b>standard</b> 6:12 <b>starting</b> 38:9 <b>state</b> 6:17, 11:23, 18:18, 37:23, 42:5, 49:7, 52:23, 61:24 <b>statement</b> 5:22, 47:6, 49:6 <b>states</b> 1:1, 6:6, 18:25 <b>stating</b> 35:23 <b>stay</b> 51:18 <b>stenographically</b> 61:10 <b>stepchildren</b> 8:17 <b>still</b> 10:17, 12:12, 14:2, 14:3, 14:7, 17:18, 17:20, 55:3 <b>stone</b> 20:12, 39:24, 45:6, 45:21 <b>street</b> 2:6, 3:14, 6:15 <b>strike</b> 14:1, 40:10, 56:16 <b>stuff</b> 20:12, 33:11, 57:10, 57:11
--	--	--	---

Transcript of Jason Svonavec  
Conducted on November 5, 2024

75

subject	T		title
12:22		48:1, 49:3,	25:13
<b>subpoena</b>	<b>take</b>	61:8, 61:9	<b>titled</b>
42:1	7:20, 30:14,	<b>thank</b>	25:16
<b>sufficiency</b>	33:11, 40:6	7:19, 7:23,	<b>today</b>
34:3	<b>taken</b>	15:16, 17:6,	6:12, 6:25,
<b>suggests</b>	40:9, 47:15,	23:18, 25:7,	7:11, 7:17,
55:18	48:3, 54:23,	31:23, 38:11,	21:11, 55:4
<b>supervision</b>	56:25, 61:6,	43:10, 46:17,	<b>today's</b>
61:11	61:9	60:13	6:10
<b>sure</b>	<b>takes</b>	<b>themselves</b>	<b>together</b>
15:5, 17:19,	22:4	6:17	14:2
17:25, 35:19,	<b>taking</b>	<b>thereafter</b>	<b>told</b>
39:18, 43:19,	6:14, 47:12	60:3, 61:10	36:18, 37:7,
56:23	<b>talk</b>	<b>therefore</b>	42:14
<b>svonavec</b>	41:25, 48:7,	34:1	<b>top</b>
1:25, 2:1, 5:2,	58:15	<b>thereupon-</b>	20:14, 25:12,
6:3, 7:3, 7:9,	<b>talked</b>	7:2	36:10, 39:1
7:20, 7:23, 8:4,	23:2	<b>things</b>	<b>towards</b>
8:9, 8:16, 8:25,	<b>tax</b>	9:17, 37:11	39:1, 47:9
9:18, 11:25,	5:20, 5:21,	<b>think</b>	<b>townsend</b>
12:20, 13:12,	38:21, 38:22,	17:18, 19:9,	3:20, 5:3,
14:7, 15:1,	39:5, 39:11,	21:24, 23:2,	6:18, 7:8, 7:10,
15:20, 15:25,	39:14, 39:17,	37:8, 42:21,	9:14, 14:20,
16:19, 17:3,	40:16, 41:7,	52:7, 55:5,	14:23, 15:2,
17:12, 18:3,	41:14, 42:4,	57:19, 60:10	15:7, 15:13,
19:5, 19:19,	42:5, 42:24,	<b>third</b>	15:19, 15:24,
23:15, 23:24,	42:25, 43:15,	40:11, 40:23,	16:4, 16:18,
24:5, 24:20,	43:16, 43:17,	46:7, 46:9,	16:22, 19:4,
25:5, 25:18,	44:3, 44:13,	46:10	19:8, 19:14,
25:22, 26:1,	45:15, 49:15	<b>three</b>	19:17, 19:18,
26:4, 26:8,	<b>teacher</b>	12:19, 45:18,	23:4, 23:12,
29:5, 30:2,	10:23	45:25, 51:16	25:1, 29:1,
30:7, 31:25,	<b>telling</b>	<b>through</b>	31:7, 31:15,
32:7, 33:9,	42:13, 42:15	9:17, 59:16	35:3, 35:11,
35:25, 36:3,	<b>ten</b>	<b>till</b>	35:19, 35:24,
36:14, 37:20,	57:24	27:25	38:4, 41:25,
38:8, 38:12,	<b>testified</b>	<b>time</b>	43:3, 46:11,
40:12, 43:7,	7:5, 55:19,	6:11, 6:12,	47:19, 48:14,
44:11, 46:15,	55:20	11:14, 24:2,	48:19, 48:23,
47:2, 49:20,	<b>testify</b>	29:9, 36:19,	49:1, 49:5,
55:2, 55:14,	57:23	45:19, 49:20,	49:9, 54:19,
59:1, 59:15,	<b>testifying</b>	51:3, 51:5,	55:1, 58:5,
60:1, 60:7,	49:4, 49:5	51:13, 52:4,	58:10, 58:13,
60:15	<b>testimony</b>	54:22, 54:25,	58:19, 58:25,
<b>sworn</b>	29:21, 36:14,	55:2, 55:7,	60:12
7:1, 7:5	42:2, 43:15,	56:18, 56:24,	<b>trail</b>
<b>sydney</b>	45:4, 47:24,	59:20, 60:16	26:8
8:22		<b>times</b>	
		54:2	

Transcript of Jason Svonavec  
Conducted on November 5, 2024

76

<b>transcript</b> 5:8, 8:1, 16:25, 23:7, 25:4, 29:4, 38:7, 43:6, 46:14, 49:19, 60:18, 61:7 <b>transfer</b> 18:22, 30:8, 30:14, 30:20, 30:25, 33:8, 55:23, 59:13, 59:19 <b>transferred</b> 37:2, 37:14 <b>transfers</b> 32:25, 59:24 <b>transportation</b> 50:5, 52:25 <b>travel</b> 26:15, 26:16, 26:19 <b>travels</b> 53:15 <b>tree</b> 38:14 <b>tristate</b> 46:24 <b>true</b> 61:8 <b>truthfully</b> 7:14, 7:17, 37:10, 42:15 <b>trying</b> 58:10, 58:20 <b>tuesday</b> 1:27 <b>turn</b> 24:15 <b>two</b> 29:13, 35:14, 45:18, 45:21, 45:24, 46:2 <b>typewriting</b> 61:11 <hr/> <p style="text-align: center;"><b>U</b></p> <hr/> <b>under</b> 35:7, 45:1,	47:17, 48:9, 61:11 <b>underneath</b> 20:7 <b>understand</b> 7:12, 16:6, 21:2, 21:3, 30:7, 32:17, 43:14, 56:5 <b>understood</b> 42:3, 48:22, 49:17, 58:19 <b>union</b> 2:6, 3:14, 6:14 <b>united</b> 1:1, 6:6 <b>unless</b> 53:2 <b>update</b> 56:15 <b>updated</b> 56:18 <b>use</b> 27:4, 27:7, 27:9, 27:11, 28:1, 50:2, 50:4, 50:15, 50:19, 51:1, 52:2, 52:22, 53:8, 53:11 <b>uses</b> 53:15 <b>usually</b> 26:17 <hr/> <p style="text-align: center;"><b>V</b></p> <hr/> <b>vague</b> 20:25 <b>valuable</b> 34:2, 34:8 <b>various</b> 59:5 <b>versus</b> 29:23 <b>via</b> 24:24 <b>video</b> 6:11, 6:13	<b>videographer</b> 4:2, 6:2, 6:12, 6:24, 54:21, 54:24, 60:14 <b>videotaped</b> 6:3 <b>viewed</b> 25:21 <b>virginia</b> 13:9 <b>voice</b> 6:16 <b>vote</b> 55:15 <hr/> <p style="text-align: center;"><b>W</b></p> <hr/> <b>waited</b> 27:25 <b>want</b> 12:19, 15:25, 19:10, 19:13, 55:5, 57:6, 59:11, 60:17 <b>wanted</b> 49:7 <b>warm</b> 30:18 <b>we'll</b> 8:2, 9:15, 25:1, 25:2, 40:10, 42:1, 48:14, 50:18, 54:4 <b>we're</b> 9:16, 12:21, 14:3, 23:4 <b>we've</b> 21:4, 43:4 <b>weather's</b> 54:3 <b>week</b> 28:12, 49:22, 51:18, 52:8 <b>weekend</b> 26:17, 26:22, 27:21, 51:15, 51:16, 51:18 <b>weekends</b> 51:17	<b>welcome</b> 28:6 <b>well-established</b> 16:7 <b>went</b> 51:13, 52:9, 57:25 <b>weren't</b> 59:3 <b>west</b> 13:9 <b>western</b> 1:2, 6:7 <b>whatever</b> 36:7, 37:6 <b>whereof</b> 61:16 <b>whether</b> 35:9, 41:17, 48:2, 58:1 <b>whole</b> 10:3, 28:12 <b>wife</b> 9:25, 12:17, 14:16, 35:18, 48:10 <b>williams</b> 57:2 <b>witness</b> 7:1, 7:4, 13:1, 17:9, 23:21, 25:10, 32:2, 38:18, 46:19, 58:21, 59:8, 61:16 <b>word</b> 19:21, 24:16 <b>words</b> 20:7 <b>work</b> 10:1, 10:6, 21:10, 21:25, 27:7, 27:10, 27:12 <b>worry</b> 9:16 <b>wouldn't</b> 46:10
--	--	---	---

Transcript of Jason Svonavec  
Conducted on November 5, 2024

77

<b>write</b> 34:15 <b>wrong</b> 20:14	<b>100</b> 17:25 <b>1098</b> 43:22, 49:15 <b>11</b> 54:25, 60:16, 60:20 <b>12</b> 12:2, 12:4, 24:22 <b>13</b> 25:6 <b>1352</b> 43:8 <b>1359</b> 43:21 <b>14</b> 25:18, 25:22, 26:1, 26:22, 28:10, 31:22, 33:25, 60:16, 60:20 <b>1448</b> 1:9, 6:8 <b>15</b> 12:2, 12:4, 58:23, 61:19 <b>15222</b> 3:24 <b>15237</b> 3:7 <b>15501</b> 2:7, 3:15, 6:15 <b>16</b> 5:12 <b>1631</b> 2:8, 3:16 <b>1844</b> 46:16 <b>192</b> 39:24, 45:6, 45:21 <b>1st</b> 32:9, 32:13, 36:22, 51:7, 51:10	<b>2018</b> 40:5 <b>2019</b> 5:21, 5:22, 43:16, 43:17, 44:4, 45:1, 45:16, 45:23, 46:10, 47:5, 47:9, 47:13, 48:3 <b>202</b> 2:6, 3:14, 6:14 <b>2022</b> 5:20, 38:22, 40:15, 41:6, 43:15 <b>2023</b> 24:9, 25:18, 25:22, 26:1, 26:22, 28:7, 28:10 <b>2024</b> 1:27, 6:10, 32:9, 32:13, 50:4, 50:13, 50:16, 50:19, 51:4, 52:5, 52:16, 53:6, 53:17, 53:22, 61:18 <b>2025</b> 61:19 <b>21</b> 9:1, 9:2 <b>210</b> 3:23 <b>22</b> 8:5 <b>23</b> 5:13 <b>233</b> 1:18, 6:9 <b>24</b> 1:9, 1:18, 6:8, 6:9, 50:9, 51:6 <b>25</b> 5:15 <b>2613</b> 3:24	<b>29</b> 5:17 <b>2:-cv</b> 1:9, 6:8 <b>3</b> <b>30,794</b> 43:23, 44:1, 44:6 <b>355</b> 3:25 <b>363</b> 38:9, 38:10 <b>369</b> 3:8 <b>38</b> 5:18 <b>3:-cv</b> 1:18, 6:9 <b>3rd</b> 47:9, 47:13 <b>4</b> <b>412</b> 3:8, 3:25 <b>43</b> 5:20 <b>443</b> 2:8, 3:16 <b>46</b> 5:21 <b>49</b> 5:22 <b>5</b> <b>550</b> 22:21, 47:3 <b>559369</b> 1:33 <b>56</b> 1:28, 6:11 <b>58</b> 54:22 <b>59</b> 5:4 <b>6</b> <b>61</b> 1:34
<b>write</b> 34:15 <b>wrong</b> 20:14	<b>100</b> 17:25 <b>1098</b> 43:22, 49:15 <b>11</b> 54:25, 60:16, 60:20 <b>12</b> 12:2, 12:4, 24:22 <b>13</b> 25:6 <b>1352</b> 43:8 <b>1359</b> 43:21 <b>14</b> 25:18, 25:22, 26:1, 26:22, 28:10, 31:22, 33:25, 60:16, 60:20 <b>1448</b> 1:9, 6:8 <b>15</b> 12:2, 12:4, 58:23, 61:19 <b>15222</b> 3:24 <b>15237</b> 3:7 <b>15501</b> 2:7, 3:15, 6:15 <b>16</b> 5:12 <b>1631</b> 2:8, 3:16 <b>1844</b> 46:16 <b>192</b> 39:24, 45:6, 45:21 <b>1st</b> 32:9, 32:13, 36:22, 51:7, 51:10	<b>2018</b> 40:5 <b>2019</b> 5:21, 5:22, 43:16, 43:17, 44:4, 45:1, 45:16, 45:23, 46:10, 47:5, 47:9, 47:13, 48:3 <b>202</b> 2:6, 3:14, 6:14 <b>2022</b> 5:20, 38:22, 40:15, 41:6, 43:15 <b>2023</b> 24:9, 25:18, 25:22, 26:1, 26:22, 28:7, 28:10 <b>2024</b> 1:27, 6:10, 32:9, 32:13, 50:4, 50:13, 50:16, 50:19, 51:4, 52:5, 52:16, 53:6, 53:17, 53:22, 61:18 <b>2025</b> 61:19 <b>21</b> 9:1, 9:2 <b>210</b> 3:23 <b>22</b> 8:5 <b>23</b> 5:13 <b>233</b> 1:18, 6:9 <b>24</b> 1:9, 1:18, 6:8, 6:9, 50:9, 51:6 <b>25</b> 5:15 <b>2613</b> 3:24	<b>29</b> 5:17 <b>2:-cv</b> 1:9, 6:8 <b>3</b> <b>30,794</b> 43:23, 44:1, 44:6 <b>355</b> 3:25 <b>363</b> 38:9, 38:10 <b>369</b> 3:8 <b>38</b> 5:18 <b>3:-cv</b> 1:18, 6:9 <b>3rd</b> 47:9, 47:13 <b>4</b> <b>412</b> 3:8, 3:25 <b>43</b> 5:20 <b>443</b> 2:8, 3:16 <b>46</b> 5:21 <b>49</b> 5:22 <b>5</b> <b>550</b> 22:21, 47:3 <b>559369</b> 1:33 <b>56</b> 1:28, 6:11 <b>58</b> 54:22 <b>59</b> 5:4 <b>6</b> <b>61</b> 1:34

Transcript of Jason Svonavec  
Conducted on November 5, 2024

78

<div>6500</div> <div>3:25</div> <div>7</div> <div>706</div> <div>3:6</div> <div>7th</div> <div>24:9, 61:17</div> <div>8</div> <div>814</div> <div>2:8, 3:16</div> <div>9</div> <div>9</div> <div>1:28, 6:11</div> <div>9696</div> <div>3:8</div>	
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